

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In Re:

**TERRORIST ATTACKS ON
SEPTEMBER 11, 2001**

Alice Hoglan, a/k/a Alice Hoagland,
individually and as **Personal Representative**
of the Estate of Mark Kendall Bingham, is
a surviving Parent of Mark Kendall Bingham

Kelly Arthurs, surviving Step-Sibling of
Mark Kendall Bingham

Karen Bingham, surviving Step-Mother of
Mark Kendall Bingham

Heather Strickland, surviving Step-Sibling
of Mark Kendall Bingham

Michelle Clendenney, surviving Step-Sibling
of Mark Kendall Bingham

Herbert Hoglan, surviving Grandfather of
Mark Kendall Bingham

D. Linden Hoglan, surviving Uncle of Mark
Kendall Bingham

Lee N. Hoglan, surviving Uncle of Mark
Kendall Bingham

Julie Bertelsen Hoglan, surviving Aunt of
Mark Kendall Bingham

Vaughn V. Hoglan, surviving Uncle of Mark
Kendall Bingham

Kathleen Brady Knudsen Hoglan, surviving
Aunt of Mark Kendall Bingham

Candyce Sue Hoglan, surviving Aunt of
Mark Kendall Bingham

Arline Peabody, surviving Step-Mother of
Michael Bane

CIVIL ACTION NO. **1:03-md-01570-GBD**
1:11-cv-07550-GBD

Brian Major, surviving Step-Sibling of Michael Bane

Brenda Jobe, surviving Step-Sibling of Michael Bane

Joseph Carpeneto, surviving Brother of
Joyce Ann Carpeneto

Dian Dembinski, named in her own right and as **Personal Representative of the Estate of Sandra Wright Cartledge**, surviving Sister of Sandra Wright Cartledge

Loretta Haines, surviving Sister of Sandra Wright Cartledge

Stephen Bradish, surviving Brother of
Sandra Wright Cartledge

Geraldine Deborah Spaeter, surviving Sister
of Sandra Wright Cartledge

Jack Bradish a/k/a John Bradish, surviving
Brother of Sandra Wright Cartledge

Nicholas Chirchirillo, surviving Child of
Peter Chirchirillo

Michael Chirchirillo, surviving Child of
Peter Chirchirillo

JoanAnn Coale, surviving Parent of Jeffrey Coale

Leslie Coale Brown, surviving Sibling of
Jeffrey Coale

Jeannette Coffey, surviving Parent of Daniel M. Coffey and surviving grandparent of Jason Coffey

Jeannette Coffey on behalf of the Estate of Daniel F. Coffey, Jr., Deceased, a surviving Parent of Daniel M. Coffey and Grandparent of Jason Coffey

Colleen McDonald, surviving Fiancée of Jason Coffey

Keith Bradkowski, surviving Domestic

Partner of Jeffrey Collman	:
	:
Kathryn Collman , surviving Step-Mother of	:
Jeffrey Collman	:
	:
Keith Bradkowski on behalf of the estate of	:
Beverly Sutton, Deceased , a surviving Parent	:
of Jeffrey Collman	:
	:
Carolyn Sutton , surviving Half-Sibling of	:
Jeffrey Collman	:
	:
Vicki Lynn Michel , surviving Half-Sibling of	:
Jeffrey Collman	:
	:
Steve Gengler , surviving Step-Sibling of	:
Jeffrey Collman	:
	:
Charles Edward Gengler , surviving Step-	:
Sibling of Jeffrey Collman	:
	:
Susan Bohan , surviving Step-Sibling of	:
Jeffrey Collman	:
	:
Jason Diehl , surviving Child of Michael	:
Diehl	:
	:
Jeannette Diehl , surviving Child of Michael	:
Diehl	:
	:
Anthony Dorf , a surviving Nephew of	:
Stephen Dorf	:
	:
Emma Fernandez Regan , surviving Sibling	:
of Judy Fernandez	:
	:
Cirilo Fernandez , surviving Parent of Judy	:
Fernandez	:
	:
Richard Fernandez , surviving Sibling of	:
Judy Fernandez	:
	:
Reneé L. Gamboa , surviving Parent of	:
Ronald Gamboa	:
	:
Reneé L. Gamboa as Personal	:
Representative of the Estate of Ranulf	:
Gamboa, Deceased , a surviving Parent of	:
Ronald Gamboa	:
	:
Maria Joule , surviving Sister of Ronald	:
Gamboa	:

Rachel G. Malubay, surviving Sister of
Ronald Gamboa

**Grace Parkinson-Godshalk as Power of
Attorney for James Bond Godshalk**,
surviving Parent of William Godshalk

Jane G. Haller, surviving Sibling of William
Godshalk

Aleese M. Hartmann, surviving Fiancée of
William Godshalk

**Tina Grazioso as Parent and Natural
Guardian of Kathryn Grazioso, a minor**,
surviving Child of John Grazioso

**Tina Grazioso as Parent and Natural
Guardian of Kristen Grazioso, a minor**
surviving Child of John Grazioso

**Tina Grazioso as Parent and Natural
Guardian of Michael Grazioso, a minor**
surviving child of John Grazioso

Carolee Azzarello, surviving Sibling of John
Grazioso

Sandra Grazioso, surviving Parent of John
Grazioso

Carole Grazioso, surviving Step-Parent of
John Grazioso

Karen Ventre, surviving Half-Sibling of John
Grazioso

Krysty Grazioso, surviving Half-Sibling of
John Grazioso

Carolee Azzarello, surviving Sibling of
Timmy Grazioso

**Deborah Grazioso, named in her own right
and as Personal Representative of the
Estate of Timmy Grazioso**, the surviving
Spouse of Timmy Grazioso

Lauren Grazioso, surviving Child of Timmy
Grazioso

Briana Grazioso, surviving Child of Timmy :
Grazioso :
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:
Sandra Grazioso, surviving Parent of Timmy :
Grazioso :
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:
Carole Grazioso, surviving Step-Parent of :
Timmy Grazioso :
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:
Karen Ventre, surviving Half-Sibling of :
Timmy Grazioso :
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:
Krysty Grazioso, surviving Half-Sibling of :
Timmy Grazioso :
:
:
Douglas Halvorson, surviving Child of James :
Halvorson :
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:
Evelyn Halvorson is a surviving Parent of :
James Halvorson :
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:
Kate Halvorson is a surviving Sibling of :
James Halvorson :
:
:
Jeanne McDermott is a surviving Sibling of :
William Wilson :
:
:
Laurel L. Conklin is a surviving Niece of :
Donald Havlish :
:
:
Sean Bitterman is a surviving Step-Child of :
Donald Havlish :
:
:
Fiona Havlish as parent and natural :
guardian of Michaela Havlish, a minor, a :
surviving Child of Donald Havlish :
:
:
Lea Bitterman is a surviving Step-Child of :
Donald Havlish :
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:
David Havlish is a surviving Nephew of :
Donald Havlish :
:
:
Derrick Hobin is a surviving Child of James :
Jeffery Hobin :
:
:
Ju-Hsiu Jian, aka Connie Jian, named in :
her own right and as the Personal :
Representative of the Estate of Hweidar :
Jian, is the surviving Spouse of Hweidar Jian :
:
:
William Jian is a surviving Child of Hweidar :

Jian	:
	:
Kevin Jian is a surviving Child of Hweidar Jian	:
	:
Anita Korsonsky is a surviving Sibling of Jeanette LaFond-Menechino	:
	:
Dina LaFond is a surviving Parent of Jeanette LaFond-Menechino	:
	:
Emily Lavelle is a surviving Parent of Denis Lavelle	:
	:
Patricia Caloia is a surviving Sibling of Denis Lavelle	:
	:
Barbara Dziadek is a surviving Sibling of Denis Lavelle	:
	:
Kathleen Palacio is a surviving Sibling of Denis Lavelle	:
	:
Paul Lavelle is a surviving Sibling of Denis Lavelle	:
	:
Stephanie Giglio is a surviving Child of Robert Levine	:
	:
Christopher James LoGuidice is a surviving Nephew of Catherine Lisa LoGuidice	:
	:
Michael A. LoGuidice, Jr. , is a surviving Nephew of Catherine Lisa LoGuidice	:
	:
Michael A. LoGuidice individually and on behalf of Nicole Elizabeth LoGuidice, a minor, and Deanna Marie LoGuidice, a minor , surviving Nieces of Catherine Lisa LoGuidice	:
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Michael A. LoGuidice on behalf of the Estate of Carmello Joseph LoGuidice, Deceased is a surviving Parent of Catherine Lisa LoGuidice	:
	:
Erick Elberth , surviving fiancée of Catherine Lisa LoGuidice,	:
	:
Joseph Lostrangio, Jr. is a surviving Child of Joseph Lostrangio	:
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Theresann Lostrangio as legal guardian of Cathryn Lostrangio, a surviving Child of Joseph Lostrangio :
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James Lostrangio, the surviving father of Joseph Lostrangio :
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Erich Maerz is a surviving Sibling of Noell Maerz :
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Ramon Melendez, Jr. is a surviving Child of Mary Melendez :
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Ricky Melendez is a surviving Child of Mary Melendez :
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Jesse Melendez is a surviving Child of Mary Melendez :
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Ramon Melendez as parent and natural guardian of Tyler Melendez, a minor, a surviving Child of Mary Melendez :
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Florence Rosario is a surviving Sibling of Mary Melendez :
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Margaret Montanez is a surviving Sibling of Mary Melendez :
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Peter C. Milano is a surviving Child of Peter T. Milano :
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Jessica Milano is a surviving Child of Peter T. Milano :
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Alfred Milano is a surviving Sibling of Peter T. Milano :
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Frank Milano is a surviving Sibling of Peter T. Milano :
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:
Maureen Racioppi is a surviving Sibling of Peter T. Milano :
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Thomas Milano is a surviving Sibling of Peter T. Milano :
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:
Rolando Ruben Moreno is a surviving Sibling of Yvette Moreno :
:
:
:
Jorge Gomez is a surviving Step-Grandfather of Yvette Moreno :
:

Pedro Gerardino is a surviving Grandfather
of Yvette Moreno

Karen Moreno is a surviving Step-Mother of
Yvette Moreno

Leiana Moreno is a surviving Step-Sister of
Yvette Moreno

Noelia Moreno is a surviving Step-Sister of
Yvette Moreno

Eric Nunez is a surviving Sibling of Brian
Nunez

Neal Green is a surviving Sibling of Brian
Nunez

**JoAnne Lovett on behalf of the Estate of
Paul Scalogna, Deceased**, a surviving
Grandfather of Brian Nunez

Donna Corbett Moran is a surviving long
time girlfriend of Brian Nunez

Diane Ognibene is a surviving Stepmother of
Philip Ognibene

James Perry is a surviving Parent of John
Perry

Joel R. Perry is a surviving Sibling of John
Perry

Janice Perry Montoya is a surviving Sibling
of John Perry

James Montoya is a surviving Nephew of
John Perry

Theresa Papasso is a surviving Parent of
Salvatore T. Papasso

Salvatore Papasso is a surviving Parent of
Salvatore T. Papasso

Vincent Papasso is a surviving Sibling of
Salvatore T. Papasso

Vincent Papasso, Jr. is a surviving Nephew
of Salvatore T. Papasso

Karen Cofresi as Parent and Natural Guardian of Brittney Cofresi, a minor, a surviving Niece of Salvatore T. Papasso

Karen Cofresi as Parent and Natural Guardian of Brendan Cofresi, a minor, a surviving Nephew of Salvatore T. Papasso

Claudia Stallworth is a surviving Parent of Marsha Ratchford

Reginald Simpson is a surviving Sibling of Marsha Ratchford

Roosevelt Stallworth is a surviving Sibling of Marsha Ratchford

Carl Stallworth is a surviving Sibling of Marsha Ratchford

Cynthia Watts is a surviving Sibling of Marsha Ratchford

Angelia Stallworth-Blunt is a surviving Sibling of Marsha Ratchford

Brian Christian is a surviving Half-Sibling of Marsha Ratchford

Amanda Rogers is a surviving Half-Sibling of Marsha Ratchford

Diana Diaz on behalf of the Estate of Carmen Romero, Deceased, a surviving Parent of Elvin Romero

Isaac Romero is a surviving Parent of Elvin Romero

Diana Diaz is a surviving Sibling of Elvin Romero

Loren Rosenthal on behalf of the Estate of Evan Rosenthal, Deceased, a surviving Child of Richard Rosenthal

Seth Rosenthal is a surviving Child of Richard Rosenthal

Audrey Model as Power of Attorney for Leonard Rosenthal, a surviving Parent of

Richard Rosenthal	:
	:
Audrey Model as Power of Attorney for	:
Florence Rosenthal , a surviving Parent of	:
Richard Rosenthal	:
	:
Audrey Model is a surviving Sibling of	:
Richard Rosenthal	:
	:
Madeleine Rosenthal is a surviving Niece of	:
Josh Rosenthal	:
	:
Alexandra Rosenthal is a surviving Niece of	:
Josh Rosenthal	:
	:
Gary Reiss is a surviving Parent of Joshua	:
Reiss	:
	:
Ida Reiss is a surviving Grandmother of	:
Joshua Reiss	:
	:
Judith Reiss on behalf of the Estate of	:
Lenore Jackson, Deceased , a surviving	:
Grandmother of Joshua Reiss	:
	:
Judith Reiss on behalf of the Estate of Ken	:
Jackson, Deceased , a surviving Grandfather	:
of Joshua Reiss	:
	:
Adam Reiss is a surviving Sibling of Joshua	:
Reiss	:
	:
Jordan Reiss is a surviving Sibling of Joshua	:
Reiss	:
	:
Jonathan Reiss is a surviving Sibling of	:
Joshua Reiss	:
	:
Jennifer Reiss is a surviving Sibling of	:
Joshua Reiss	:
	:
Alexander Rowe, named as Personal	:
Representative of the Estate of Nicholas	:
Rowe , is a surviving Parent of Nicholas Rowe	:
	:
Rachael Logan is a surviving Sibling of	:
Nicholas Rowe	:
	:
Alexander Rowe as legal guardian of	:
Nadine Rowe , a surviving Sibling of Nicholas	:
Rowe	:
	:

Paul Rowe is a surviving Sibling of Nicholas Rowe :
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:
Michelle Baker is a surviving long time :
girlfriend of Nicholas Rowe :
:
:
Alexander Rowe on behalf of the Estate of :
Judith Rowe, Deceased, a surviving Parent of :
Nicholas Rowe :
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:
Victor Santillan is a surviving Sibling of :
Maria Theresa Santillan :
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Raymond Santillan is a surviving Sibling of :
Maria Theresa Santillan :
:
:
Kirsten Saracini is a surviving Child of :
Victor Saracini :
:
:
Brielle Saracini is a surviving Child of Victor :
Saracini :
:
:
Lori Brody is a surviving Sibling of Scott :
Schertzer :
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:
Ellen Schertzer is a surviving Parent of Scott :
Schertzer :
:
:
Patricia Sloan is a surviving Parent of Paul :
K. Sloan :
:
:
Matt Sloan is a surviving Sibling of Paul K. :
Sloan :
:
:
Sarah Funk is a surviving Sibling of Paul K. :
Sloan :
:
:
Gail Smith is a surviving Step-Mother of :
George Smith :
:
:
Raymond Smith on behalf of the Estate of :
Marion Thomas, Deceased, a surviving :
Grandmother of George Smith :
:
:
Raymond Smith on behalf of the Estate of :
Deborah Sallad, Deceased, a surviving :
sibling, of George Smith :
:
:
Martin Smith is a surviving Nephew of :
George Smith :
:
:
Raymond Smith as legal guardian of Troia :

Johnson, a minor , a surviving Niece of George Smith	:
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Tawanda Smith is a surviving Niece of George Smith	:
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Danielle Smith is a surviving Niece of George Smith	:
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Diane Smith is a surviving Niece of George Smith	:
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Carl Smith is a surviving Sibling of George Smith	:
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Kevin Smith is a surviving Sibling of George Smith	:
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Korry Smith is a surviving Sibling of George Smith	:
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Tanya Warren is a surviving sibling of George Smith	:
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Latricia Smith is a surviving Sibling of George Smith	:
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Elaine Smith is a surviving Sibling of George Smith	:
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Christine Jackson is a surviving Sibling of George Smith	:
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	:
Barbara Hargrove is a surviving Sibling of George Smith	:
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	:
Raymond Smith, Jr. , is a surviving Sibling of George Smith	:
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	:
Gail Smith as parent and natural guardian of Samuel Collazo, a minor , a surviving Step-brother of George Smith	:
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	:
Gabriella Rinehart is a surviving Step-Sister of George Smith	:
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	:
Raymond Woods is a surviving Cousin of George Smith	:
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	:
Scott Woods is a surviving Cousin of George Smith	:
	:
	:

Lisa Smith is a surviving Cousin of George Smith :

Gail Smith as Parent and Natural Guardian of Leonardo Collazo, a minor, a surviving Step-Brother of George Smith :

Angela LeGrand is a surviving Sibling of George Smith :

Timothy P. Soulas, Jr. is a surviving Child of Timothy Soulas, Sr. :

Andrew J. Soulas is a surviving Child of Timothy Soulas :

Christopher Soulas is a surviving Child of Timothy Soulas :

Katherine Soulas as parent and natural guardian of Matthew Soulas, a minor, a surviving Child of Timothy Soulas :

Katherine Soulas as parent and natural guardian of Nicole Soulas, a minor, a surviving Child of Timothy Soulas :

Katherine Soulas as parent and natural guardian of Daniel Soulas, a minor, a surviving Child of Timothy Soulas :

Frederick Soulas is a surviving Parent of Timothy Soulas :

Stephen Soulas is a surviving Sibling of Timothy Soulas :

Frederick Soulas, III is a surviving Sibling of Timothy Soulas :

Dan Soulas is a surviving Sibling of Timothy Soulas :

Michelle Donlan is a surviving Sibling of Timothy Soulas :

Brian David Huber is a surviving Nephew of William Steiner :

Daniel Huber is a surviving Nephew of William Steiner :

Darren Steiner is a surviving Child of	:
William Steiner	:
	:
Jordan Steiner is a surviving Child of	:
William Steiner	:
	:
Meredith Reverdito is a surviving Child of	:
William Steiner	:
	:
Robert Steiner on behalf of the Estate of	:
Wilma Steiner, Deceased , a surviving Parent	:
of William Steiner	:
	:
Kaitlin Steiner Keller is a surviving Niece of	:
William Steiner	:
	:
Robert Steiner is a surviving Sibling of	:
William Steiner	:
	:
Denise Steiner Donohue is a surviving Niece	:
of William Steiner	:
	:
Denise Steiner Donohue as Executrix of the	:
Estate of Dawn Steiner, Deceased , a	:
surviving Niece of William Steiner	:
	:
Kristyn Steiner-Martin is a surviving Niece	:
of William Steiner	:
	:
George M. Steiner , a surviving nephew of	:
William Steiner	:
	:
Addison Friedman is a surviving Nephew of	:
William Steiner	:
	:
Adriana Friedman is a surviving Niece of	:
William Steiner	:
	:
Anthony Friedman-Ceraso is a surviving	:
Nephew of William Steiner	:
	:
Kristen Druckenmiller is a surviving Niece	:
of William Steiner	:
	:
Heather Caudill is a surviving Niece of	:
William Steiner	:
	:
Stephanie Feher is a surviving Niece of	:
William Steiner	:
	:
George W. Steiner is a surviving Sibling of	:
William Steiner	:

Louise Borzumato is a surviving
Grandmother of Andrew Stergiopoulos

Kathleen Stergiopoulos is a surviving Sibling of Andrew Stergiopoulos

George Stergiopoulos, Jr. is a surviving Sibling of Andrew Stergiopoulos

Aaron Straub is a surviving Child of Edward W. Straub

Sandra Straub as parent and natural guardian of Jonathan Straub, a minor, a surviving Child of Edward W. Straub

Michael Straub is a surviving Child of Edward W. Straub

Samuel Straub is a surviving Child of Edward W. Straub

Edward Straub is a surviving Parent of Edward W. Straub

Stanley Straub is a surviving Brother of Edward W. Straub

Matthew Straub is a surviving Brother of Edward W. Straub

Salvatore Tino is a surviving Parent of Jennifer Tino

Jeffrey Tino is a surviving Sibling of Jennifer Tino

Salvatore Tino, Jr. is a surviving Sibling of Jennifer Tino

Adam C. Fuller is a surviving Nephew of Meta Waller

Nina Fuller is a surviving Niece of Meta Waller

Joseph Nicklo is a surviving Sibling of Jeanmarie Wallendorf

Mellanie Chafe is a surviving Sibling of
Jeanmarie Wallendorf

Christopher Barton is a surviving Sibling of
Jeanmarie Wallendorf

**Christine Barton Pence as Parent and
Natural Guardian of John Barton**, a minor,
a surviving Sibling of Jeanmarie Wallendorf

Susanne Ward-Baker is a surviving Parent
of Timothy Ward

Norma Ward is a surviving Step-Mother of
Timothy Ward

Jessica Kramer is a surviving Step-Sibling of
Timothy Ward

Christi Pendergraft is a surviving Step-
Sibling of Timothy Ward

Robert Ward is a surviving Uncle of
Timothy Ward

Richard Ward is a surviving Uncle of
Timothy Ward

Carl L. Ward is a surviving Uncle of
Timothy Ward

Lance Ward is a surviving Cousin of
Timothy Ward

Mike Smith is a surviving Cousin of Timothy
Ward

Jason Smith is a surviving Cousin of
Timothy Wardone

Marc Ward is a surviving Cousin of Timothy
Ward

**Norma Ward as Legal Guardian of
Brianna Scoggins, a minor**, a surviving
Niece of Timothy Ward

**Norma Ward as Legal Guardian of Shawn
Pendergraft, minor**, a surviving Nephew of
Timothy Ward

**Norma Ward as Legal Guardian of Charles
Pendergraft, a minor**, a surviving Nephew
of Timothy Ward

Deborah Zeplin, representative in her own right and as Personal Representative of the Estate of Marc Scott Zeplin, is a surviving Spouse of Marc Scott Zeplin

Deborah Zeplin as parent and natural guardian of Ryan Zeplin, a minor, a surviving Child of Marc Scott Zeplin

Deborah Zeplin as parent and natural guardian of Ethan Zeplin, a minor, a surviving Child of Marc Scott Zeplin

Sigal Shefi-Asher, individually and as Personal Representative of the Estate of Hagay Shefi, a surviving Spouse of Hagay Shefi

Sigal Shefi-Asher, as parent and natural guardian of Roy-Yetkutiell, a minor surviving son of Hagay Shefi

Sigal Shefi-Asher, as parent and natural guardian of Naomi-Ruth Shefi, a minor surviving daughter of Hagay Shefi

Dov Shefi, surviving Parent of Hagay Shefi

Esther-Rivka Shefi, surviving Parent of Hagay Shefi

Yishai Shefi, surviving brother of Hagay Shefi

Pazit Baum-Shefi, surviving sister of Hagay Shefi

Joy Kaufman, a.k.a. Rina Kaufman, surviving sister of Leon Lebor

Bessie Lebor, surviving parent of Leon Lebor

Barbara Lurman, individually and as the Personal Representative of the Estate of Leon Lebor, a surviving daughter of Leon Lebor

Kui Liong Lee, individually and as Personal Representative of the Estate of Siew Nya Ang, a surviving Spouse of Siew Nya Ang

Kui Long Lee, as parent and natural guardian of Winnee Lee, a minor surviving daughter of Siew Nya Ang

Jeanee Lee, surviving daughter of Siew Nya Ang

Julie Tyler, surviving cousin of Timmy R. Ward

Michelle Arthurs, surviving step-mother of Mark Kendall Bingham

**Melodie Homer, individually and as
Personal Representative of the Estate of
LeRoy W. Homer, Jr.,** surviving Spouse of
LeRoy W. Homer, Jr.

Melodie Homer, as parent and natural guardian of Laurel Homer, a minor surviving daughter of LeRoy W. Homer, Jr.

John R. Jones, as a surviving Parent of
Donald W. Jones

Audrey R. Jones, as a surviving Parent of
Donald W. Jones

Robert A. Jones, as a surviving Sibling of
Donald W. Jones

Candy Jones Moyer, as a surviving Sibling
of Donald W. Jones

Amy Martinez, the surviving Spouse of
Louis Nacke, **individually and as Personal
Representative of the Estate of Louis Nacke**

Tanya Davis, the surviving Spouse of Wayne T. Davis, **individually and as Personal Representative of the Estate of Wayne T. Davis, and on behalf of Gabrielle Hunter Davis, a minor and Malachai Roarke Davis, a minor**, surviving Children of Wayne T. Davis

Noverta Davis-Dean, as the surviving Parent
of Wayne T. Davis

**Philomena Mistrulli, individually and as
Personal Representative of the Estate of**

Joseph D. Mistrulli , the surviving Spouse of Joseph D. Mistrulli	:
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Angela Mistrulli , as the surviving Child of Joseph D. Mistrulli	:
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	:
Joseph Mistrulli , as the surviving Child of Joseph D. Mistrulli	:
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MaryAnn Mistrulli-Rosser , as the surviving child of Joseph D. Mistrulli	:
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	:
Ann Mistrulli , as the surviving Parent of Joseph D. Mistrulli	:
	:
	:
Johnny Mistrulli , as the surviving Sibling of Joseph D. Mistrulli	:
	:
	:
Maria Lambert , as the surviving Sibling of Joseph D. Mistrulli	:
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	:
Maryann Pino , as the surviving Sister-in- Law of Joseph D. Mistrulli and on behalf of Mateo Pino, a minor , a surviving nephew of Joseph D. Mistrulli	:
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	:
Tony Pino , as the surviving Brother-in Law of Joseph D. Mistrulli	:
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	:
Anthony Pino , as the surviving Nephew of Joseph D. Mistrulli	:
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	:
James Mandelino, Sr. , as the surviving Father-in-Law of Joseph D. Mistrulli	:
	:
	:
James Mandelino , as the surviving Brother- in-Law of Joseph D. Mistrulli	:
	:
	:
Michael Mandelino , as the surviving Brother-in-Law of Joseph D. Mistrulli	:
	:
	:
Jennie Mandelino , as the surviving Sister-in- Law of Joseph D. Mistrulli	:
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	:
Karen Lunder, individually and as Personal Representative of the Estate of Christopher E. Lunder , the surviving Spouse of Christopher E. Lunder	:
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	:
Plaintiffs,	:
	:

v. :

THE ISLAMIC REPUBLIC OF IRAN, :

c/o Permanent Mission of Iran :

to the United Nations :

622 Third Avenue :

New York, NY 10017 :

AYATOLLAH ALI HOSEINI- :

KHAMENEI, Supreme Leader :

c/o Permanent Mission of Iran :

to the United Nations :

622 Third Avenue :

New York, NY 10017 :

ALI AKBAR HASHEMI RAFSANJANI :

c/o Permanent Mission of Iran :

to the United Nations :

622 Third Avenue :

New York, NY 10017 :

IRANIAN MINISTRY OF :

INFORMATION AND SECURITY :

c/o Permanent Mission of Iran :

to the United Nations :

622 Third Avenue :

New York, NY 10017 :

THE ISLAMIC REVOLUTIONARY :

GUARD CORPS :

c/o Permanent Mission of Iran :

to the United Nations :

622 Third Avenue :

New York, NY 10017 :

HEZBOLLAH, :

an unincorporated association :

c/o Permanent Mission of Iran : :

to the United Nations :

622 Third Avenue :

New York, NY 10017 :

THE IRANIAN MINISTRY :

OF PETROLEUM :

c/o BijanNamdar-Zanganeh :

Hafez Crossing, Taleghani Avenue :

Before Hafez Bridge : :

Tehran, Iran :

THE NATIONAL IRANIAN :

TANKER CORPORATION :

c/o Mohammed Souri, Chairman :

#67 and 88; Atefi Street; Africa Ave.
Tehran, Iran

**THE NATIONAL IRANIAN
OIL CORPORATION**

c/o Madhi Mir Maezzei
Chief Managing Director
Hafez Crossing, Taleghani Avenue
P.O. Box 1863
Tehran, Iran

**THE NATIONAL IRANIAN
GAS COMPANY**

#410, Mafatteh Crossing,
Taleghani Avenue
P.O. Box 6394,4533
Tehran, Iran

IRAN AIRLINES

c/o Eng. Davoud Keshavarzian
Chairman and CEO
Iran Air H.Q.
Mahrabad Airport
Tehran, Iran

**THE NATIONAL IRANIAN
PETROCHEMICAL COMPANY**

#46 Haft Tir Square
KarimkhanZand Boulevard
P.O. Box 11365-3484
Tehran, Iran

**IRANIAN MINISTRY OF
ECONOMIC AFFAIRS AND FINANCE**

c/o Safdar Hoseini
Sour Esrafil Street,
Bab Hodayoun Avenue
Tehran, Iran

**IRANIAN MINISTRY OF
COMMERCE**

492 Valy-e Asr Avenue
Between Taleghani Crossroad and
Valy-e Asr Square
Tehran, Iran

**IRANIAN MINISTRY OF DEFENSE
AND ARMED FORCES LOGISTICS**

Ali Shamkhani Dabestan Street
Seyyed Khandan Bridge
Resalat Expressway
Tehran, Iran

**THE CENTRAL BANK OF THE
ISLAMIC REPUBLIC OF IRAN**

c/o Mahmoud Bahmani, Governor
Miramad Boulevard, #144
Tehran, Iran

**SHEIK USAMAH BIN-MUHAMMAD
BIN-LADEN, Deceased**

**aka OSAMA BIN LADEN, Deceased
and the**

ESTATE OF OSAMA BIN LADEN

Last Known Address:
Waziristan Haveli
Bilal Town
Abbottabad, Pakistan

and

AL-QAEDA/ISLAMIC ARMY,

an unincorporated association

Last Known Location:
Islamic Republic of Afghanistan

Defendants.

SECOND AMENDED COMPLAINT

Plaintiffs in this action are either personal representatives of the Estates, or family members of, seventy (70) Decedents who were murdered as a result of the terrorist attacks against the United States on September 11, 2001. The instant lawsuit is related to the prior action of *Havlish, et al. v. bin Laden, et al.*, 03 MDL 1570 (GBD) (FM), 03 Civ. 9848 (GBD) (FM), as defined by the National Defense Authorization Act for Fiscal Year 2008, Pub.L. No. 110-181 §1083(c)(3)(A). Plaintiffs seek compensatory and punitive damages against Defendants for their role in facilitating and carrying out the attacks. In support of their claims, Plaintiffs state the following:

INTRODUCTION

1. On September 11, 2001, 2,976 individuals, referred to herein as “Decedents,” were murdered when nineteen terrorists caused four airliners to crash into the World Trade Center Towers in New York, the Pentagon Building in Arlington County, Virginia and a field near the town of Shanksville, Pennsylvania. The nineteen hijackers (hereinafter collectively referred to as the “al-Qaeda hijackers” or the “hijackers”) were members of a network known as al-Qaeda, a terrorist organization dedicated to the destruction of the United States and its citizens. The al-Qaeda organization was, and is, dedicated to the goal of establishing a universal Islamic state through the use of violence. Immediately prior to the 9/11 attacks, al-Qaeda maintained its headquarters in Afghanistan.

2. The leader of al-Qaeda was Osama bin Laden (hereinafter referred to as “bin Laden”), a former citizen of Saudi Arabia who, prior to his death on May 2, 2011, planned, conspired, funded, directed, controlled, and engaged in terrorist activities and pursuits involving intentional and willful mass murder of thousands of innocent men, women, and children, including the victims of the 9/11 terrorist attacks. On several occasions, bin Laden admitted al-Qaeda’s

participation in, and responsibility for, the 9/11 attacks.

3. Al-Qaeda trained, funded and supported the hijackers, with the aid and assistance of various individuals, organizations and governments, including Defendants named herein - the Islamic Republic of Iran (“Iran”), its agencies and instrumentalities (referred to collectively as the “Instrumentality Defendants”), and its terrorist proxy, Hezbollah.

4. For years prior to the 9/11 attacks, bin Laden had declared and advocated “jihad” - holy war - against the United States. For example, on February 23, 1998, bin Laden urged jihad against Americans and published in the newspaper *Al Quds al-Arabi* the following: “*the ruling to kill the Americans and their allies - civilians and military - is an individual duty for every Muslim who can do it in any country in which it is possible to do it.*” On August 20, 1998, President Clinton advised that the United States was taking military action against terrorist objectives in Afghanistan and Sudan: “*Our target was terror; our mission was clear: to strike at the network of radical groups affiliated with and funded by Osama Bin Laden, perhaps the preeminent organizer and financier of international terrorism in the world today.*” On August 21, 1998, the United States Department of State found that: “*Bin Laden’s network leads, funds and inspires a wide range of Islamic extremist groups that perpetrate acts of terrorism around the world.*”

5. In conducting their terrorist activities, bin Laden and al-Qaeda received financial, logistical and other material support from foreign states. In particular, Iran and the Instrumentality Defendants provided bin Laden and al-Qaeda with material support that aided the 9/11 terrorist attacks. Plaintiffs now seek to hold defendants accountable for their role in facilitating these murders.

JURISDICTION AND VENUE

6. Jurisdiction arises pursuant to 28 U.S.C. §§ 1330(a), 1331 and 1332(a)(2) and 18 U.S.C. §2388. Jurisdiction also arises based on Defendants' violations of 28 U.S.C. §§ 1605A (the Foreign Sovereign Immunities Act), 28 U.S.C. §1350 ("Alien Tort Claims Act"), the Torture Victim Protection Act of 1991, PL 102-256, 106 Stat. 73 (reprinted at 28 U.S.C.A. §1350 note (West 1993)), and 18 U.S.C. §2333.

7. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(d) and 1391(f)(4).

8. Venue is also proper in this District because the instant lawsuit is related to *Havlish, et al. v. bin Laden, et al.*, 03 Civ. 9848 (GBD) (FM) and is part of the Multidistrict Litigation captioned *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (FM) that is situated in this Court.

9. As herein alleged, actions for wrongful death, personal injury and related torts perpetrated by foreign states, such as defendant Iran, through their agencies and instrumentalities, and through their officials, employees and agents, fall within the exceptions to jurisdictional immunity contained in the Foreign Sovereign Immunities Act, specifically the terrorism exception contained in 28 U.S.C. §1605A.

PLAINTIFFS

10. **Alice Hoglan, named in her own right and as Personal Representative of the Estate of Mark Kendall Bingham**, is a surviving Parent of Mark Kendall Bingham, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

11. **Kelly Arthurs** is a surviving Step-Sibling of Mark Kendall Bingham, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried

out by that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

12. **Michelle Arthurs** is a surviving step-mother of Mark Kendall Bingham, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

13. **Karen Bingham** is a surviving Step-Mother of Mark Kendall Bingham, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

14. **Heather Strickland** is a surviving Step-Sibling of Mark Kendall Bingham, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

15. **Michelle Clendenney** is a surviving Step-Sibling of Mark Kendall Bingham, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

16. **Herbert Hoglan** is a surviving Grandfather of Mark Kendall Bingham, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

17. **D. Linden Hoglan** is a surviving Uncle of Mark Kendall Bingham, one of the

Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

18. **Lee N. Hoglan** is a surviving Uncle of Mark Kendall Bingham, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

19. **Julie Bertelsen Hoglan** is a surviving Aunt of Mark Kendall Bingham, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

20. **Vaughn V. Hoglan** is a surviving Uncle of Mark Kendall Bingham, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

21. **Kathleen Brady Knudsen Hoglan** is a surviving Aunt of Mark Kendall Bingham, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

22. **Candyce Sue Hoglan** is a surviving Aunt of Mark Kendall Bingham, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

23. **Arline Peabody** is a surviving Step-Mother of Michael Bane, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

24. **Brian Major** is a surviving Step-Sibling of Michael Bane, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

25. **Brenda Jobe** is a surviving Step-Sibling of Michael Bane, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

26. **Joseph Carpeneto** is a surviving Brother of Joyce Ann Carpeneto, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

27. **Dian Dembinski, named in her own right and as Personal Representative of the Estate of Sandra Wright Cartledge**, is a surviving Sister of Sandra Wright Cartledge, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

28. **Loretta Haines** is a surviving Sister of Sandra Wright Cartledge, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian

Defendants provided material support and assistance in furtherance of the attacks.

29. **Stephen Bradish** is a surviving Brother of Sandra Wright Cartledge, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

30. **Geraldine Deborah Spaeter** is a surviving Sister of Sandra Wright Cartledge, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

31. **Jack Bradish a/k/a/ John Bradish** is a surviving Brother of Sandra Wright Cartledge, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

32. **Nicholas Chirchirillo** is a surviving Child of Peter Chirchirillo, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

33. **Michael Chirchirillo** is a surviving Child of Peter Chirchirillo, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

34. **Joan Ann Coale** is a surviving Parent of Jeffrey Coale, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by

Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

35. **Leslie Coale Brown** is a surviving Sibling of Jeffrey Coale, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

36. **Jeannette Coffey**, is a surviving parent of Daniel M. Coffey and surviving grandparent of Jason Coffey, both of whom are Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

37. **Jeannette Coffey on behalf of the Estate of Daniel F. Coffey, Jr.** is a surviving parent (deceased) of Daniel M. Coffey and surviving grandparent (deceased) of Jason Coffey, both of whom are Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

38. **Colleen McDonald** is a surviving Fiancée of Jason Coffey, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

39. **Keith Bradkowski** is a surviving Domestic Partner of Jeffrey Collman, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian

Defendants provided material support and assistance in furtherance of the attacks.

40. **Kathryn Collman** is a surviving Step-Mother of Jeffrey Collman, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

41. **Keith Bradkowski** brings this action as representative and on behalf of the **Estate of Beverly Sutton**, a surviving Parent (now deceased) of Jeffrey Collman, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

42. **Carolyn Sutton** is a surviving Half-Sibling of Jeffrey Collman, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

43. **Vicki Lynn Michel** is a surviving Half-Sibling of Jeffrey Collman, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

44. **Steve Gengler** is a surviving Step-Sibling of Jeffrey Collman, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

45. **Charles Edward Gengler** is a surviving Step-Sibling of Jeffrey Collman, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were

carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

46. **Susan Bohan** is a surviving Step-Sibling of Jeffrey Collman, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

47. **Jason Diehl** is a surviving Child of Michael Diehl, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

48. **Jeannette Diehl** is a surviving Child of Michael Diehl, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

49. **Anthony Dorf** is a surviving Nephew of Stephen Dorf, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

50. **Emma Fernandez Regan** is a surviving Sibling of Judy Fernandez, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

51. **Cirilo Fernandez** is a surviving Parent of Judy Fernandez, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by

Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

52. **Richard Fernandez** is a surviving Sibling of Judy Fernandez, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

53. **Reneé L. Gamboa** is a surviving Parent of Ronald Gamboa, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

54. **Reneé L. Gamboa** bring this action as Personal Representative of the **Estate of Ranulf Gamboa**, a surviving Parent (now deceased) of Ronald Gamboa, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

55. **Maria Joule** is a surviving Sister of Ronald Gamboa, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

56. **Rachel G. Malubay** is a surviving Sister of Ronald Gamboa, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

57. **Grace Parkinson-Godshalk** brings this action under Power of Attorney for

James Bond Godshalk, a surviving Parent of William Godshalk, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

58. **Jane G. Haller** is a surviving Sibling of William Godshalk, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

59. **Aleese M. Hartmann** is a surviving Fiancée of William Godshalk, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

60. **Tina Grazioso** brings this action as parent and natural guardian of **Kathryn Grazioso**, a minor surviving Child of John Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

61. **Tina Grazioso** brings this action as parent and natural guardian of **Kristen Grazioso**, a minor surviving Child of John Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

62. **Tina Grazioso** brings this action as parent and natural guardian of **Michael Grazioso**, a minor surviving Child of John Grazioso, one of the Decedents murdered as a result

of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

63. **Carolee Azzarello** is a surviving Sibling of John Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

64. **Sandra Grazioso** is a surviving Parent of John Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

65. **Carole Grazioso** is a surviving Step-Parent of John Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

66. **Karen Ventre** is a surviving Half-Sibling of John Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

67. **Krysty Grazioso** is a surviving Half-Sibling of John Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

68. **Carolee Azzarello** is a surviving Sibling of Timmy Grazioso, one of the

Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

69. **Deborah Grazioso**, brings this action in her own right and as Personal Representative of the **Estate of Timmy Grazioso**, the surviving Spouse of Timmy Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

70. **Lauren Grazioso** is a surviving Child of Timmy Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

71. **Briana Grazioso** is a surviving Child of Timmy Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

72. **Sandra Grazioso** is a surviving Parent of Timmy Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

73. **Carole Grazioso** is a surviving Step-Parent of Timmy Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

74. **Karen Ventre** is a surviving Half-Sibling of Timmy Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

75. **Krysty Grazioso** is a surviving Half-Sibling of Timmy Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

76. **Douglas Halvorson** is a surviving Child of James Halvorson, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

77. **Evelyn Halvorson** is a surviving Parent of James Halvorson, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

78. **Kate Halvorson** is a surviving Sibling of James Halvorson, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

79. **Jeanne McDermott** is a surviving Sibling of William Wilson, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

80. **Laurel L. Conklin** is a surviving Niece of Donald Havlish, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

81. **Sean Bitterman** is a surviving Step-Child of Donald Havlish, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

82. **Fiona Havlish** brings this action as parent and natural guardian of **Michaela Havlish**, a minor surviving Child of Donald Havlish, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

83. **Lea Bitterman** is a surviving Step-Child of Donald Havlish, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

84. **David Havlish** is a surviving Nephew of Donald Havlish, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

85. **Derrick Hobin** is a surviving Child of James Jeffery Hobin, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by

Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

86. **Ju-Hsiu Jian aka Connie Jian** brings this action in her own right and as the Personal Representative of the **Estate of Hweidar Jian**. **Ju-Hsiu Jian** is the surviving Spouse of Hweidar Jian, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

87. **William Jian** is a surviving Child of Hweidar Jian, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

88. **Kevin Jian** is a surviving Child of Hweidar Jian, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

89. **Anita Korsonsky** is a surviving Sibling of Jeanette LaFond-Menechino, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

90. **Dina LaFond** is a surviving Parent of Jeanette LaFond-Menechino, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

91. **Emily Lavelle** is a surviving Parent of Denis Lavelle, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

92. **Patricia Caloia** is a surviving Sibling of Denis Lavelle, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

93. **Barbara Dziadek** is a surviving Sibling of Denis Lavelle, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

94. **Kathleen Palacio** is a surviving Sibling of Denis Lavelle, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

95. **Paul Lavelle** is a surviving Sibling of Denis Lavelle, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

96. **Stephanie Giglio** is a surviving Child of Robert Levine, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

97. **Christopher James LoGuidice** is a surviving Nephew of Catherine Lisa LoGuidice, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

98. **Nicole Elizabeth LoGuidice** is a surviving Niece of Catherine Lisa LoGuidice, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

99. **Deanna Marie LoGuidice** is a surviving Niece of Catherine Lisa LoGuidice, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

100. **Michael A. LoGuidice, Jr.** brings this action individually as a surviving Nephew of Catherine Lisa LoGuidice, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

101. **Michael A. LoGuidice** brings this action individually and as representative and on behalf of the **Estate of Carmello Joseph LoGuidice**, a surviving Parent (now deceased) of Catherine Lisa LoGuidice, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

102. **Michael A. LoGuidice** also brings this action on behalf of **Nicole Elizabeth LoGuidice, a minor** and **Deanna Marie LoGuidice, a minor**, surviving Nieces of Catherine Lisa LoGuidice, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

103. **Erick Elberth**, surviving fiancée of Catherine Lisa LoGuidice, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

104. **Joseph Lostrangio, Jr.** is a surviving Child of Joseph Lostrangio, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

105. **Theresann Lostrangio** brings this action as legal guardian of **Cathryn Lostrangio**, a surviving Child of Joseph Lostrangio, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

106. **James Lostrangio** is the surviving father of Joseph Lostrangio, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

107. **Erich Maerz** is a surviving Sibling of Noell Maerz, one of the Decedents

murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

108. **Ramon Melendez, Jr.** is a surviving Child of Mary Melendez, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

109. **Ramon Melendez** brings this action individually and as parent and natural guardian of **Tyler Melendez, a minor**, a surviving Child of Mary Melendez, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

110. **Ricky Melendez** is a surviving Child of Mary Melendez, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

111. **Jesse Melendez** is a surviving Child of Mary Melendez, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

112. **Florence Rosario** is a surviving Sibling of Mary Melendez, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

113. **Margaret Montanez** is a surviving Sibling of Mary Melendez, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

114. **Peter C. Milano** is a surviving Child of Peter T. Milano, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

115. **Jessica Milano** is a surviving Child of Peter T. Milano, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

116. **Alfred Milano** is a surviving Sibling of Peter T. Milano, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

117. **Frank Milano** is a surviving Sibling of Peter T. Milano, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

118. **Maureen Racioppi** is a surviving Sibling of Peter T. Milano, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

119. **Thomas Milano** is a surviving Sibling of Peter T. Milano, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

120. **Rolando Ruben Moreno** is a surviving Sibling of Yvette Moreno, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

121. **Jorge Gomez** is a surviving Step-Grandfather of Yvette Moreno, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

122. **Pedro Gerardino** is a surviving Grandfather of Yvette Moreno, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

123. **Karen Moreno** is a surviving Step-Mother of Yvette Moreno, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

124. **Leiana Moreno** is a surviving Step-Sister of Yvette Moreno, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

125. **Noelia Moreno** is a surviving Step-Sister of Yvette Moreno, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

126. **Eric Nunez** is a surviving Sibling of Brian Nunez, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

127. **Neal Green** is a surviving Sibling of Brian Nunez, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

128. **JoAnne Lovett** brings this action as representative and on behalf of the **Estate of Paul Scalogna**, a surviving Grandfather of Brian Nunez, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

129. **Donna Corbett Moran** is a surviving long time girlfriend of Brian Nunez, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

130. **Diane Ognibene** is a surviving Stepmother of Philip Ognibene, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian

Defendants provided material support and assistance in furtherance of the attacks.

131. **James Perry** is a surviving Parent of John Perry, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

132. **Joel R. Perry** is a surviving Sibling of John Perry, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

133. **Janice Perry Montoya** is a surviving Sibling of John Perry, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

134. **James Montoya** is a surviving Nephew of John Perry, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

135. **Theresa Papasso** is a surviving Parent of Salvatore T. Papasso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

136. **Salvatore Papasso** is a surviving Parent of Salvatore T. Papasso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian

Defendants provided material support and assistance in furtherance of the attacks.

137. **Vincent Papasso** is a surviving Sibling of Salvatore T. Papasso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

138. **Vincent Papasso, Jr.** is a surviving Nephew of Salvatore T. Papasso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

139. **Karen Cofresi** brings this action as parent and natural guardian of **Brittney Cofresi**, a minor surviving Niece of Salvatore T. Papasso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

140. **Karen Cofresi** brings this action as parent and natural guardian of **Brendan Cofresi**, a minor surviving Nephew of Salvatore T. Papasso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

141. **Claudia Stallworth** is a surviving Parent of Marsha Ratchford, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

142. **Reginald Simpson** is a surviving Sibling of Marsha Ratchford, one of the

Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

143. **Roosevelt Stallworth** is a surviving Sibling of Marsha Ratchford, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

144. **Carl Stallworth** is a surviving Sibling of Marsha Ratchford, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

145. **Cynthia Watts** is a surviving Sibling of Marsh Ratchford, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

146. **Angelia Stallworth-Blunt** is a surviving Sibling of Marsha Ratchford, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

147. **Brian Christian** is a surviving Half-Sibling of Marsha Ratchford, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

148. **Amanda Rogers** is a surviving Half-Sibling of Marsha Ratchford, one of the

Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

149. **Diana Diaz** brings this action as representative and on behalf of the **Estate of Carmen Romero**, a surviving Parent of Elvin Romero, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

150. **Isaac Romero** is a surviving Parent of Elvin Romero, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

151. **Diana Diaz** is a surviving Sibling of Elvin Romero, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

152. **Loren Rosenthal** brings this action as representative and on behalf of the **Estate of Evan Rosenthal**, a surviving Child (now deceased) of Richard Rosenthal, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

153. **Seth Rosenthal** is a surviving Child of Richard Rosenthal, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian

Defendants provided material support and assistance in furtherance of the attacks.

154. **Audrey Model** brings this action under Power of Attorney for **Leonard Rosenthal**, a surviving Parent of Richard Rosenthal, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

155. **Audrey Model** brings this action under Power of Attorney for **Florence Rosenthal**, a surviving Parent of Richard Rosenthal, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

156. **Audrey Model** brings this action individually as a surviving Sibling of Richard Rosenthal, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

157. **Madeleine Rosenthal** is a surviving Niece of Josh Rosenthal, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

158. **Alexandra Rosenthal** is a surviving Niece of Josh Rosenthal, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

159. **Gary Reiss** is a surviving Parent of Joshua Reiss, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

160. **Ida Reiss** is a surviving Grandmother of Joshua Reiss, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

161. **Judith Reiss** brings this action as representative and on behalf of the **Estate of Lenore Jackson**, a surviving Grandmother (now deceased) of Joshua Reiss, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

162. **Judith Reiss** brings this action as representative and on behalf of the **Estate of Ken Jackson**, a surviving Grandfather (now Deceased) of Joshua Reiss, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

163. **Adam Reiss** is a surviving Sibling of Joshua Reiss, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

164. **Jordan Reiss** is a surviving Sibling of Joshua Reiss, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by

Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

165. **Jonathan Reiss** is a surviving Sibling of Joshua Reiss, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

166. **Jennifer Reiss** is a surviving Sibling of Joshua Reiss, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

167. **Alexander Rowe** brings this action as the Personal Representative of the **Estate of Nicholas Rowe**, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

168. **Rachael Logan** is a surviving Sibling of Nicholas Rowe, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

169. **Alexander Rowe** brings this action as legal guardian of **Nadine Rowe**, a surviving Sibling of Nicholas Rowe, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

170. **Paul Rowe** is a surviving Sibling of Nicholas Rowe, one of the Decedents

murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

171. **Michelle Baker** is a surviving long-term girlfriend of Nicholas Rowe, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

172. **Alexander Rowe** brings this action as representative and on behalf of the **Estate of Judith Rowe**, a surviving Parent (now deceased) of Nicholas Rowe, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

173. **Victor Santillan** is a surviving Sibling of Maria Theresa Santillan, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

174. **Raymond Santillan** is a surviving Sibling of Maria Theresa Santillan, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

175. **Kirsten Saracini** is a surviving Child of Victor Saracini, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

176. **Brielle Saracini** is a surviving Child of Victor Saracini, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

177. **Lori Brody** is a surviving Sibling of Scott Schertzer, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

178. **Ellen Schertzer** is a surviving Parent of Scott Schertzer, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

179. **Patricia Sloan** is a surviving Parent of Paul K. Sloan, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

180. **Matt Sloan** is a surviving Sibling of Paul K. Sloan, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

181. **Sarah Funk** is a surviving Sibling of Paul K. Sloan, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

182. **Gail Smith** is a surviving Step-Mother of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

183. **Raymond Smith** brings this action as representative and on behalf of the **Estate of Marion Thomas**, a surviving Grandmother (now deceased) of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

184. **Raymond Smith** brings this action as representative and on behalf of the **Estate of Deborah Sallad**, a surviving sibling (now deceased) of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

185. **Martin Smith** is a surviving Nephew of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

186. **Raymond Smith** brings this action as legal guardian of **Troia Johnson, a minor**, a surviving Niece of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

187. **Tawanda Smith** is a surviving Niece of George Smith, one of the Decedents

murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

188. **Danielle Smith** is a surviving Niece of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

189. **Diane Smith** is a surviving Niece of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

190. **Carl Smith** is a surviving Sibling of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

191. **Kevin Smith** is a surviving Sibling of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

192. **Korry Smith** is a surviving Sibling of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

193. **Tanya Warren** is a surviving Sibling of George Smith, one of the Decedents

murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

194. **Latricia Smith** is a surviving Sibling of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

195. **Elaine Smith** is a surviving Sibling of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

196. **Christine Jackson** is a surviving Sibling of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

197. **Barbara Hargrove** is a surviving Sibling of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

198. **Raymond Smith, Jr.** is a surviving Sibling of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

199. **Gail Smith** brings this action as parent and natural guardian of **Samuel Collazo**,

a minor, a surviving Step-brother of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

200. **Gabriella Rinehart** is a surviving Step-Sister of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

201. **Raymond Woods** is a surviving Cousin of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

202. **Scott Woods** is a surviving Cousin of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

203. **Lisa Smith** is a surviving Cousin of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

204. **Gail Smith** brings this action as parent and natural guardian of **Leonardo Collazo, a minor**, a surviving Step-Brother of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided

material support and assistance in furtherance of the attacks.

205. **Angela LeGrand** is a surviving Sibling of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

206. **Timothy P. Soulas, Jr.** is a surviving Child of Timothy Soulas. Sr., one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

207. **Andrew J. Soulas** is a surviving Child of Timothy Soulas, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

208. **Christopher Soulas** is a surviving Child of Timothy Soulas, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

209. **Katherine Soulas** brings this action as parent and natural guardian of **Matthew Soulas**, a minor surviving child of Timothy Soulas, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

210. **Katherine Soulas** brings this action as parent and natural guardian of **Nicole Soulas**, a minor surviving child of Timothy Soulas, one of the Decedents murdered as a result of

the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

211. **Katherine Soulas** brings this action as parent and natural guardian of **Daniel Soulas**, a minor surviving child of Timothy Soulas, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

212. **Frederick Soulas** is a surviving Parent of Timothy Soulas, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

213. **Stephen Soulas** is a surviving Sibling of Timothy Soulas, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

214. **Frederick Soulas, III** is a surviving Sibling of Timothy Soulas, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

215. **Dan Soulas** is a surviving Sibling of Timothy Soulas, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

216. **Michelle Donlan** is a surviving Sibling of Timothy Soulas, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

217. **Brian David Huber** is a surviving Nephew of William Steiner, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

218. **Daniel Huber** is a surviving Nephew of William Steiner, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

219. **Darren Steiner** is a surviving Child of William Steiner, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

220. **Jordan Steiner** is a surviving Child of William Steiner, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

221. **Meredith Reverdito** is a surviving Child of William Steiner, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

222. **Robert Steiner** brings this action as representative and on behalf of the **Estate of Wilma Steiner**, a surviving Parent (now deceased) of William Steiner, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

223. **Kaitlin Steiner Keller** is a surviving Niece of William Steiner, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

224. **Robert Steiner** is a surviving Sibling of William Steiner, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

225. **Denise Steiner Donohue** is a surviving Niece of William Steiner, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

226. **Denise Steiner Donohue** brings this action as Executrix of the **Estate of Dawn Steiner**, a surviving Niece (now deceased) of William Steiner, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

227. **Kristyn Steiner-Martin** is a surviving Niece of William Steiner, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried

out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

228. **George M. Steiner**, a surviving nephew of William Steiner, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

229. **Addison Friedman** is a surviving Nephew of William Steiner, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

230. **Adriana Friedman** is a surviving Niece of William Steiner, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

231. **Anthony Friedman-Ceraso** is a surviving Nephew of William Steiner, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

232. **Kristen Druckenmiller** is a surviving Niece of William Steiner, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

233. **Heather Caudill** is a surviving Niece of William Steiner, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by

Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

234. **Stephanie Feher** is a surviving Niece of William Steiner, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

235. **George W. Steiner** is a surviving Sibling of William Steiner, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

236. **Louise Borzumato** is a surviving Grandmother of Andrew Stergiopoulos, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

237. **Kathleen Stergiopoulos** is a surviving Sibling of Andrew Stergiopoulos, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

238. **George Stergiopoulos, Jr.** is a surviving Sibling of Andrew Stergiopoulos, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

239. **Aaron Straub** is a surviving Child of Edward W. Straub, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by

Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

240. **Sandra Straub** brings this action as parent and natural guardian of **Jonathan Straub**, a minor surviving child of Edward W. Straub, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

241. **Michael Struab** is a surviving Child of Edward W. Straub, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

242. **Samuel Straub** is a surviving Child of Edward W. Straub, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

243. **Edward Straub** is a surviving Parent of Edward W. Straub, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

244. **Stanley Straub** is a surviving Brother of Edward W. Straub, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

245. **Matthew Straub** is a surviving Brother of Edward W. Straub, one of the

Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

246. **Salvatore Tino** is a surviving Parent of Jennifer Tino, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

247. **Jeffrey Tino** is a surviving Sibling of Jennifer Tino, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

248. **Salvatore Tino, Jr.** is a surviving Sibling of Jennifer Tino, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

249. **Adam C. Fuller** is a surviving Nephew of Meta Waller, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

250. **Nina Fuller** is a surviving Niece of Meta Waller, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

251. **Joseph Nicklo** is a surviving Sibling of Jeanmarie Wallendorf, one of the

Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

252. **Mellanie Chafe** is a surviving Sibling of Jeanmarie Wallendorf, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

253. **Christopher Barton** is a surviving Sibling of Jeanmarie Wallendorf, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

254. **Christine Barton Pence** brings this action individually and as parent and natural guardian of **John Barton**, a minor surviving Sibling of Jeanmarie Wallendorf, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

255. **Susanne Ward-Baker** is a surviving Parent of Timothy Ward, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

256. **Norma Ward** is a surviving Step-Mother of Timothy Ward, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

257. **Jessica Kramer** is a surviving Step-Sibling of Timothy Ward, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

258. **Christi Pendergraft** is a surviving Step-Sibling of Timothy Ward, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

259. **Robert Ward** is a surviving Uncle of Timothy Ward, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

260. **Richard Ward** is a surviving Uncle of Timothy Ward, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

261. **Carl L. Ward** is a surviving Uncle of Timothy Ward, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

262. **Lance Ward** is a surviving Cousin of Timothy Ward, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

263. **Mike Smith** is a surviving Cousin of Timothy Ward, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

264. **Jason Smith** is a surviving Cousin of Timothy Ward, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

265. **Marc Ward** is a surviving Cousin of Timothy Ward, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

266. **Norma Ward** brings this action as legal guardian of **Brianna Scoggins**, a minor surviving niece of Timothy Ward, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

267. **Norma Ward** brings this action as legal guardian of **Shawn Pendergraft**, a minor surviving nephew of Timothy Ward, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

268. **Norma Ward** brings this action as legal guardian of **Charles Pendergraft**, a minor surviving nephew of Timothy Ward, one of the Decedents murdered as a result of the

terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

269. **Deborah Zeplin**, brings this action individually and as the personal representative of the **Estate of Marc Scott Zeplin**. **Deborah Zeplin** is a surviving Spouse of Marc Scott Zeplin, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

270. **Deborah Zeplin** brings this action as parent and natural guardian of **Ryan Zeplin**, a minor surviving child of Marc Scott Zeplin, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

271. **Deborah Zeplin** brings this action as parent and natural guardian of **Ethan Zeplin**, a minor surviving child of Marc Scott Zeplin, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

272. **Sigal Shefi-Asher** brings this action individually and as Personal Representative of the **Estate of Hagay Shefi**. **Sigal Shefi-Asher** is the surviving Spouse of Hagay Shefi, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

273. **Sigal Shefi-Asher** brings this action as parent and natural guardian of **Roy-Yetkutieli**, a minor surviving son of Hagay Shefi, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

274. **Sigal Shefi-Asher** brings this action as parent and natural guardian of **Naomi-Ruth Shefi**, a minor surviving daughter of Hagay Shefi, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

275. **Dov Shefi** is a surviving Parent of Hagay Shefi, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

276. **Esther-Rivka Shefi** is a surviving Parent of Hagay Shefi, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

277. **Yishai Shefi** is a surviving brother of Hagay Shefi, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian

Defendants provided material support and assistance in furtherance of the attacks.

278. **Pazit Baum-Shefi** is a surviving sister of Hagay Shefi, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

279. **Joy Kaufman, a.k.a. Rina Kaufman**, is a surviving sister of Leon Lebor, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

280. **Bessie Lebor** is a surviving parent of Leon Lebor, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

281. **Barbara Lurman** brings this action individually and as the Personal Representative of the **Estate of Leon Lebor**. **Barbara Lurman** is a surviving daughter of Leon Lebor, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

282. **Kui Liong Lee** brings this action individually and as Personal Representative of the **Estate of Siew Nya Ang**. **Kui Liong Lee** is a surviving Spouse of Siew Nya Ang, one of the

Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

283. **Kui Long Lee** brings this action as parent and natural guardian of **Winniee Lee**, a minor surviving daughter of Siew Nya Ang, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

284. **Jeanee Lee** is a surviving daughter of Siew Nya Ang, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

285. **Julie Tyler** is a surviving cousin of Timmy R. Ward, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

286. **Melodie Homer**, brings this action individually and as Personal Representative of the **Estate of LeRoy W. Homer, Jr.** **Melodie Homer** is the surviving spouse of LeRoy W. Homer, Jr., one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

287. **Melodie Homer** brings this action as parent and natural guardian of **Laurel Homer**, a minor surviving daughter of LeRoy W. Homer, Jr., one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-

Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

288. **John R. Jones** is a surviving Parent of Donald W. Jones, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

289. **Audrey R. Jones** is a surviving Parent of Donald W. Jones, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

290. **Robert A. Jones** is a surviving sibling of Donald W. Jones, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

291. **Candy Jones Moyer** is a surviving sibling of Donald W. Jones, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

292. **Amy Martinez** brings this action individually and as the Personal Representative of the **Estate of Louis Nacke**. **Amy Martinez** is the surviving Spouse of Louis Nacke, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

293. **Tanya Davis** brings this action individually and as Personal Representative of the

Estate of Wayne T. Davis. **Tanya Davis** is the surviving spouse of Wayne T. Davis, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

294. **Tanya Davis** also brings this action on behalf of the two surviving minor children of **Tanya Davis** and **Wayne T. Davis**, **Gabrielle Hunter Davis, a minor**, and **Malachai Roarke Davis, a minor**.

295. **Noverta Davis-Dean** is the Parent of Wayne T. Davis, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

296. **Philomena Mistrulli** brings this action individually and as Personal Representative of the **Estate of Joseph D. Mistrulli**. **Philomena Mistrulli** is the surviving spouse of Joseph D. Mistrulli, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

297. **Angela Mistrulli** is the surviving Child of Joseph D. Mistrulli, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

298. **Joseph Mistrulli** is the surviving Child of Joseph D. Mistrulli, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian

Defendants provided material support and assistance in furtherance of the attacks.

299. **MaryAnn Mistrulli-Rosser** is the surviving Child of Joseph D. Mistrulli, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

300. **Ann Mistrulli** is the surviving Parent of Joseph D. Mistrulli, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

301. **Johnny Mistrulli** is the surviving Sibling of Joseph D. Mistrulli, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

302. **Maria Lambert** is the surviving Sibling of Joseph D. Mistrulli, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

303. **Maryann Pino** is the surviving Sister-in-Law of Joseph D. Mistrulli, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

304. **Maryann Pino** also brings this action on behalf of **Mateo Pino, a minor**, a surviving nephew of Joseph D. Mistrulli, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama

bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

305. **Tony Pino** is the surviving Brother-in-Law of Joseph D. Mistrulli, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

306. **Anthony Pino** is the surviving Nephew of Joseph D. Mistrulli, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

307. **James Mandelino, Sr.** is the surviving Father-in-Law of Joseph D. Mistrulli, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

308. **James Mandelino** is the surviving Brother-in-Law of Joseph D. Mistrulli, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

309. **Michael Mandelino** is the surviving Brother-in-Law of Joseph D. Mistrulli, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

310. **Jennie Mandelino** is the surviving Sister-in-Law of Joseph D. Mistrulli, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were

carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

311. **Karen Lunder** brings this action individually and as Personal Representative of the **Estate of Christopher E. Lunder**. **Karen Lunder** is the surviving spouse of Christopher E. Lunder, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which Iran and the Iranian Defendants provided material support and assistance in furtherance of the attacks.

DEFENDANTS

Islamic Republic Of Iran And Iran's State Actors

312. Defendant Islamic Republic of Iran ("Iran") is a foreign state within the meaning of 28 U.S.C. § 1391(f). Iran maintains an Interest Section within the United States at the Embassy of Pakistan at 2204 Wisconsin Avenue, N.W., Washington, D.C. 20007.

313. Iran has been waging virtually an undeclared war against the United States and Israel for thirty years. Iran wages this undeclared war through asymmetrical, or unconventional, strategies and terrorism, often through proxies such as Hezbollah, HAMAS, al-Qaeda and others.

314. Iran has for many years been designated as a foreign state that sponsors terrorism within the meaning of the Export Administration Act of 1979, 50 U.S.C. App. §2405(j), and the Foreign Assistance Act of 1961, 22 U.S.C. § 2371(b). Iran has been so designated by the U.S. Department of State every year since 1984. Iran has repeatedly been found liable under the Foreign Sovereign Immunities Act, 28 U.S.C. §1602, *et seq.*, for deaths and injuries caused by its activities as a state sponsor of international terrorism, particularly in connection with acts perpetrated by the paramilitary terrorist organization sponsored by Iran known as "Hizballah" or "Hezbollah." Iran's involvement in international terrorism has been documented in a long line

of cases in both this Court and the United States District Court for the District of Columbia, including recent decisions in *Estate of Heiser v. Islamic Republic of Iran*, 659 F.Supp.2d 20 (D.D.C. 2009), *Valore v. Islamic Republic of Iran*, 700 F.Supp.2d 52 (D.D.C. 2010) and *Havlish v. bin Laden*, 2012 WL 3090979 (S.D.N.Y. 2012). *See also* Findings of Fact and Conclusions of Law entered by the Honorable George B. Daniels in *Havlish, et al. v. bin Laden, et al.* on December 22, 2001.

315. Since the time Iran was designated by the State Department as a state sponsor of terrorism, a large body of evidence has been collected and analyzed which shows conclusively that Iran views terrorism as an instrument of state policy, like diplomacy or military power - a tool to be used to further political objectives. The evidence shows that Iran has, over the years, directly carried out assassinations, bombings and other terrorist acts against its enemies, and Iran has also carried out such terrorist acts through its terrorist proxy, Hezbollah. Iran has also provided direct and indirect support to international terrorist groups, sometimes directly, and other times through Hezbollah, in the form of money, training, sanctuary, documentation, intelligence, weapons and other types of assistance. Al-Qaeda is one such terrorist organization that has received direct and material support from Iran and Hezbollah.

316. To carry out its policy of terrorism and support for terrorist groups, Iran has created and used government organizations including intelligence ministries, the military, and various types of quasi-governmental companies and entities which are directly answerable to, and receive instructions from, the Islamic regime in power in Iran. Some of these entities are named herein as state actors, i.e. part and parcel of the Islamic Republic of Iran; others are named herein as the “Instrumentality Defendants.”

317. As described herein, Iran acted through its officials, officers, agents, employees, agencies and instrumentalities in providing direct and material support, and resources, to

Defendant al-Qaeda. The support provided by Iran included assistance in, and contribution to, the preparation and execution of the plans that culminated in the hijacked flights and the extrajudicial killings of the 9/11 Decedents.

318. The following individuals and governmental entities of Iran are named as Defendants in this action:

(a) Ayatollah Ali Hoseini-Khamenei (“Khamenei”), is the most important and powerful official in Iran. Ayatollah Khamenei has been the Supreme Leader of the Islamic Republic of Iran since 1989. Khamenei is the commander-in-chief of the armed forces, appoints the head of each military service, declares war and peace for the nation-state of Iran, appoints the head of Iran's judiciary, and he may dismiss the elected president of Iran, among many other powers outlined in Article 110 of the Iranian Constitution. Ayatollah Khamenei's power is, as his title suggests, supreme. He is the head of state, and, for all intents and purposes, Khamenei is the Iranian government. Khamenei is certainly - by far - the most powerful person in the Iranian government. His term of office is unlimited. Defendant Khamenei has a long record of direct involvement in Iran's material support for terrorism. In the late 1990s, Ayatollah Khamenei formed a special intelligence apparatus that reported directly to him and worked under his direct control. This special intelligence apparatus has engaged in the planning, support, and direction of terrorism. Khamenei has been found to be an instrumentality of Iran for purposes of liability and damages under the Foreign Sovereign Immunities Act. *See, e.g., Flatow v. Islamic Republic of Iran*, 999 F.Supp. 1 (D.D.C. 1998). As head of the Iranian state, Khamenei is responsible for formulating and executing the nation's policy of supporting terrorism and terrorist groups such as Defendant al-Qaeda. As a government agent, Khamenei maintains a presence in the United States through the Permanent

Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11th Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007.

(b) Defendant Ali Akbar Hashemi Rafsanjani ("Rafsanjani") is one of the wealthiest individuals in Iran, and he has held a number of top positions in Iran's government. From 1989 to 1997, Rafsanjani was the president of Iran; from 1981 to 1989, he was the speaker of the Iranian parliament. Currently, Rafsanjani heads two important bodies established by the Iranian Constitution: the Assembly of Experts and the Expediency Council. Defendant Rafsanjani has a long record of direct involvement in Iran's material support for terrorism. Rafsanjani was instrumental in planning, sponsoring and hosting several meetings in Iran with leaders of Defendant al-Qaeda and other worldwide terrorists. It was at these meetings that the plans for the September 11, 2001, terrorist attacks were discussed and finalized. As a government agent, Rafsanjani maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11th Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. In addition, it is believed that Rafsanjani holds a financial interest in several properties throughout the United States.

(c) Defendant Iranian Ministry of Information and Security ("MOIS") is a political subdivision of the nation-state the Islamic Republic of Iran. This agency has core functions which are governmental, not commercial, in nature. This agency was established by law, its head is appointed by the president subject to confirmation by the parliament, its budget is proposed by the president and approved by the parliament, and its funding comes almost entirely from general tax revenues. Iran's MOIS is a well-

funded and skilled intelligence agency with an annual budget between \$100 million and \$400 million. MOIS has been a key instrument of the government of Iran for its material support of terrorist groups like Hezbollah and as a terrorist agency of the Iranian government. Many of the U.S. State Department reports on global terrorism over the past twenty-five (25) years refer to MOIS as Iran's key facilitator and director of terrorist attacks. MOIS has been found to be an instrumentality of Iran for purposes of liability and damages under the Foreign Sovereign Immunities Act. *See, e.g., Sutherland. v. Islamic Republic of Iran*, 151 F.Supp.2d 27 (D.D.C. 2001). With a large budget and extensive organization, MOIS is one of the most powerful ministries in the Iranian government. The ministry has traditionally operated under the guidance of the *Velayat-e Faqih* apparatus of the Supreme Leader.

(d) Defendant Islamic Revolutionary Guard Corps ("IRGC") is a political/military subdivision of the nation-state the Islamic Republic of Iran. This agency has core functions which are governmental in nature. The IRGC was established by the Iranian constitution, which sets forth the IRGC's responsibilities and powers. The IRGC reports directly to Iran's Supreme Leader, and it operates as an agent and instrumentality of the Supreme Leader himself. The IRGC is a military force parallel to the regular Iranian military and to the formal governmental structure. The IRGC's funding comes in large part from general tax revenues, yet the IRGC also owns and controls hundreds of companies and commercial interests, and it holds billions of dollars in military, business, and other assets and government contracts. The IRGC has a special foreign division, known as the Qods (or Quds or "Jerusalem") Force, which is the arm of the IRGC that works with militant organizations abroad and promotes terrorism overseas. The Qods Force has a long history of engaging in coups, insurgencies, assassinations,

kidnappings, bombings, and arms dealing, and it is one of the most organized, disciplined, and violent terrorist organizations in the world. The U.S. State Department has designated the IRGC as a "foreign terrorist organization," and the U.S. Treasury Department has designated the IRGC-Qods Force as a "terrorist organization." As a government agency, the IRGC maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11th Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007.

(e) Hezbollah (alternatively spelled "Hizballah") is a surrogate of Iran's MOIS through which the Iranian government executes many of its terrorist plans. The goal of Hezbollah was to bring the ideals of the Islamic Revolution in Iran to Lebanon. Hezbollah is funded, directed and controlled by the Iranian government. President Clinton issued Executive Order 12947 on January 23, 1997, which named Hezbollah a Specially Designated Terrorist, along with 11 other organizations which had committed, or posed a significant risk of committing, acts of violence which threatened to disrupt the Middle East peace process. *See* 60 Fed. Reg. 5079 (Jan. 23, 1997). On October 8, 1997, the U.S. Department of State further designated Hezbollah as a Foreign Terrorist Organization pursuant to the Immigration and Nationality Act, 8 U.S.C. §1189. *See* 62 Fed. Reg. 52650 (Oct. 8, 1997). A Foreign Terrorist Organization is one that engages in terrorist activity, retains the capability and intent to engage in terrorist activity, and whose terrorist activity threatens the security of U.S. nationals or the United States. In the wake of the attacks of September 11, 2001, which are the basis of this Second Amended Complaint, President Bush issued Executive Order 13224, which identified 12

individuals and 15 entities which were a continuing and immediate threat to the security of U.S. nationals and the United States. *See* 66 Fed. Reg. 49079 (Sept. 23, 2001). Pursuant to this Order, the U.S. Department of State listed Hezbollah as a Specially Designated Global Terrorist. *See* Fed. Reg. 12633 (Mar. 19, 2002). Hezbollah, as a government agency, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11th Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007, or through the Permanent Representative of Lebanon to the United Nations, 866 United Nations Plaza, Room 531-533, New York, NY 10017.

(f) Defendant Iranian Ministry of Economic Affairs and Finance (“IMEAF”) is a political subdivision of the nation-state the Islamic Republic of Iran. This agency has core functions which are governmental, not commercial, in nature. This agency was established by law, its head is appointed by the president subject to confirmation by the parliament, its budget is proposed by the president and approved by the parliament, and its funding comes almost entirely from general tax revenues. All Iranian government ministries are responsible for carrying out the policies of the Iranian government, among them state support for terrorism. The IMEAF, as a government agency, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11th Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. The IMEAF funnels funds to the Iranian government with knowledge that the Iranian government uses those funds to support its own terrorist activities as well as those of Defendant Hezbollah and al-Qaeda.

(g) Defendant Iranian Ministry of Commerce (“IMOC”) is a political subdivision of the nation-state the Islamic Republic of Iran. This agency has core functions which are governmental, not commercial, in nature. This agency was established by law, its head is appointed by the president subject to confirmation by the parliament, its budget is proposed by the president and approved by the parliament, and its funding comes almost entirely from general tax revenues. All Iranian government ministries are responsible for carrying out the policies of the Iranian government, among them state support for terrorism. The IMOC, as a government agency, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11th Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. The IMOC funnels funds to the Iranian government with knowledge that the Iranian government uses those funds to support its own terrorist activities as well as those of Defendants Hezbollah and al-Qaeda.

(h) Defendant Iranian Ministry of Defense and Armed Forces Logistics (“IMDAFL”) is a political/military subdivision of the nation-state the Islamic Republic of Iran. This agency has core functions which are governmental, not commercial, in nature. This agency was established by law, its head is appointed by the president subject to confirmation by the parliament, its budget is proposed by the president and approved by the parliament, and its funding comes almost entirely from general tax revenues. All Iranian government ministries are responsible for carrying out the policies of the Iranian government, among them state support for terrorism. The IMDAFL, as a government agency, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11th Floor,

New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. The IMDAFL funnels funds to the Iranian government with knowledge that the Iranian government uses those funds to support its own terrorist activities as well as those of Defendants Hezbollah and al-Qaeda.

(i) Defendant Iranian Ministry of Petroleum is a political subdivision of the nation-state the Islamic Republic of Iran. This agency has core functions which are governmental, not commercial, in nature. This agency was established by law, its head is appointed by the president subject to confirmation by the parliament, its budget is proposed by the president and approved by the parliament, and its funding comes almost entirely from general tax revenues. All Iranian government ministries are responsible for carrying out the policies of the Iranian government, among them state support for terrorism. The affiliated entities of the MOP are the National Iranian Gas Company, National Iranian Petrochemical Company and the Iranian Offshore Oil Company. The MOP maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11th Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. The MOP, in conjunction with and through these affiliated entities, generates substantial money that is used by the Iranian government to fund its terrorist activities, including its support of Defendants Hezbollah and al-Qaeda.

The Instrumentality Defendants

319. The following Defendants are instrumentalities of the Islamic Republic of Iran:

(a) The National Iranian Tanker Corporation (“NITC”) is an Iranian

corporation owned and controlled by the Iranian government. The NITC, as a government controlled entity, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11th Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. The NITC funnels funds to the Iranian government with knowledge that the Iranian government uses those funds to support its own terrorist activities as well as those of Defendants Hezbollah and al-Qaeda.

(b) The Central Bank of the Islamic Republic of Iran (“CBI”) is a financial institution owned and controlled by the Iranian government. The CBI, as a government controlled entity, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11th Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. The main offices of the CBI are located at 23 Ferdowsi Avenue, P.O. Box 11365/8551, Tehran, Iran. The CBI keeps accounts for, grants loans to and otherwise funnels funds to the Iranian government with knowledge that the Iranian government uses those funds to support its own terrorist activities as well as those of Defendants Hezbollah and al-Qaeda.

(c) National Iranian Oil Corporation (“NIOC”) is an Iranian corporation owned and controlled by the Iranian government. The NIOC, as a government controlled entity, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11th Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. The NIOC funnels funds to the

Iranian government with knowledge that the Iranian government uses those funds to support its own terrorist activities as well as those of Defendants Hezbollah and al-Qaeda.

(d) National Iranian Gas Company (“NIGC”) is an Iranian corporation owned and controlled by the Iranian government. The NIGC, as a government controlled entity, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11th Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. The NIGC funnels funds to the Iranian government with knowledge that the Iranian government uses those funds to support its own terrorist activities as well as those of Defendants Hezbollah and al-Qaeda.

(e) Iran Air is an Iranian corporation owned and controlled by the Iranian government. Iran Air, as a government controlled entity, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11th Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. Iran Air funnels funds to the Iranian government with knowledge that the Iranian government uses those funds to support its own terrorist activities as well as those of Defendants Hezbollah and al-Qaeda. In addition, Iran Air knowingly assists Iran’s efforts to export terrorism by transporting individual terrorists to destinations for the purpose of committing terrorist acts in foreign countries.

(f) National Iranian Petrochemical Company (“NIPC”) is an Iranian corporation owned and controlled by the Iranian government. The NIPC, as a government controlled entity, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360

Lexington Avenue, 11th Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. The NIPC funnels funds to the Iranian government with knowledge that the Iranian government uses those funds to support its own terrorist activities as well as those of Defendants Hezbollah and al-Qaeda.

320. At all relevant times, Iran used the Instrumentality Defendants to further its funding and support of terrorist activities against the United States and its citizens, including its support for Defendants Hezbollah and al-Qaeda.

The Non-Sovereign Defendants

321. Defendant Sheikh Usamah bin-Muhammad bin-Laden, Deceased, (hereinafter referred to as “Osama bin Laden” or “bin Laden”) is a former citizen of Saudi Arabia who was located in Afghanistan at the time of the terrorist attacks of September 11, 2001. On May 2, 2011, bin Laden was killed inside a building known locally as Waziristan Haveli in the Bilal Town neighborhood of Abbottabad, Pakistan. Plaintiffs bring action against the Estate of Osama Bin Laden, Deceased and seek to restrain any assets of his Estate, known or unknown. At all times material hereto, Osama bin Laden planned, conspired, funded, directed, controlled, and engaged in terrorist activities and pursuits involving intentional and willful mass murder of thousands of innocent men, women, and children. The end result of those activities was the murder of all Decedents on September 11, 2001.

322. Defendant Osama bin Laden announced what he declared to be “jihad” - holy war - against the United States on numerous occasions since 1996. On February 23, 1998, Bin Laden urged jihad against Americans and published in the newspaper *Al Quds al-Arabi* the following: “*the ruling to kill the Americans and their allies - civilians and military - is an individual duty for every Muslim who can do it in any country in which it is possible to do it.*”

On August 20, 1998, President Clinton stated that the United States was taking military action against terrorist objectives in Afghanistan and Sudan: *“Our target was terror, our mission was clear: to strike at the network of radical groups affiliated with and funded by Osama bin Laden, perhaps the preeminent organizer and financier of international terrorism in the world today.”*

On August 21, 1998, the United States Department of State found that: *“Bin Laden’s network leads, funds and inspires a wide range of Islamic extremist groups that perpetrate acts of terrorism around the world.”*

323. In conducting his terrorist activities, Osama bin Laden received financial, logistical and other material support from Defendants Iran, Hezbollah and the Instrumentality Defendants.

324. Defendant al-Qaeda/Islamic Army (hereinafter “al-Qaeda”) is an unincorporated association and terrorist organization dedicated to the destruction of the United States and its citizens. At relevant times, the al-Qaeda organization was headquartered in Afghanistan and involved a cluster of military-ideological camps dedicated to bin Laden and al-Qaeda’s goal of establishing a universal Islamic state through the use of violence. Al-Qaeda maintains terrorist cells throughout the world.

325. Defendant al-Qaeda uses violence, bombings, murder, mayhem and other terrorist tactics in order to pursue its unlawful objectives. At relevant times, al-Qaeda was supported, controlled, funded, protected, aided and abetted by all defendants, particularly bin Laden, and the agencies, instrumentalities, agents, officials and employees of Iran, including Hezbollah.

326. Defendant al-Qaeda was founded, headed and directed by defendant Osama Bin Laden. In addition to bin Laden, certain individuals were responsible for the direction and management of al-Qaeda’s terrorist activities, including the terrorist attacks of September 11, 2001. Those individuals acted both individually and as agents, instrumentalities, officials,

representatives, officers and employees of al-Qaeda in exporting terror to the United States and other countries.

FACTUAL BACKGROUND

Background of al-Qaeda

327. In or about 1989, Osama bin Laden, Muhammad Atef and others founded an international terrorist group that became known as al-Qaeda (“the Base”). Osama bin Laden was the “emir” (prince) of al-Qaeda and was its leader at all relevant times. Members of al-Qaeda pledged an oath of allegiance (called a “bayat”) to Osama bin Laden and al-Qaeda.

328. From 1989 until about 1991, al-Qaeda was headquartered in the Islamic Emirate of Afghanistan and Peshawar, Pakistan. In or about 1991, the leadership of al-Qaeda, including its emir, Osama bin Laden, relocated to the Sudan. Al-Qaeda was headquartered in the Sudan from approximately 1991 until approximately 1996 but also maintained a presence and activities in various parts of the world. In 1996, Osama bin Laden and other members of al-Qaeda relocated again to the Islamic Emirate of Afghanistan.

329. Bin Laden and al-Qaeda violently opposed the United States for several reasons. First, the United States was regarded as an “infidel nation” because it was not governed in a manner consistent with the group's extremist interpretation of Islam. Second, the United States was viewed as providing essential support for other “infidel” governments and institutions. Third, al-Qaeda opposed the involvement of the United States armed forces in the Gulf War in 1991 and in Operation Restore Hope in Somalia in 1992 and 1993. In particular, al-Qaeda opposed the continued presence of American military forces in Saudi Arabia (and elsewhere on the Arabian peninsula) following the Gulf War. Fourth, al-Qaeda opposed the United States Government because of the arrest, conviction and imprisonment of persons belonging to al-Qaeda or its affiliated terrorist groups or those with whom it worked. For these and other

reasons, bin Laden declared jihad, or holy war, against the United States, which he carried out through al-Qaeda and its affiliated organizations.

330. At relevant times, al-Qaeda functioned both on its own and through terrorist organizations that operated under its umbrella, including Egyptian Islamic Jihad, which was led by Ayman al-Zawahiri, the Islamic Group (also known as “el Gamaa el Islamia” or simply “Gamaa’t”), and a number of jihad groups in other countries, including the Sudan, Egypt, Saudi Arabia, Yemen, Somalia, Eritrea, Djibouti, Afghanistan, Pakistan, Bosnia, Croatia, Albania, Algeria, Tunisia, Lebanon, the Philippines, Tajikistan, Azerbaijan, the Kashmiri region of India and the Chechnyan region of Russia. Al-Qaeda also maintained cells and personnel in a number of countries to facilitate its activities, including Kenya, Tanzania, the United Kingdom, Germany, Canada, Malaysia, and the United States.

331. Al-Qaeda had a command and control structure which included a “majlis al shura” (or consultation council) which discussed and approved major undertakings, including terrorist operations. Al-Qaeda also had a “military committee” which considered and approved “military” matters.

332. Bin Laden and al-Qaeda forged alliances with representatives of the government of Iran, and its associated terrorist group Hezbollah, for the purpose of working together against their perceived common enemy in the West, the United States.

333. At relevant times, bin Laden and al-Qaeda sponsored, managed, and/or financially supported training camps in Afghanistan. Those camps were used to instruct members and associates of al-Qaeda and its affiliated terrorist groups in the use of firearms, explosives, chemical weapons, and other weapons of mass destruction. In addition to providing training in the use of various weapons, these camps were used to conduct operational planning against United States targets around the world and experiments in the use of chemical and biological

weapons. These camps were also used to train al-Qaeda members in security and counterintelligence methods, such as the use of codes and passwords, and to teach members and associates of al-Qaeda about traveling to perform operations. For example, al-Qaeda instructed its members and associates to dress in “Western” attire and to use other methods to avoid detection by security officials. The group also taught its members and associates to monitor media reports of its operations to determine the effectiveness of their terrorist activities.

334. During the time from about 1996 when al-Qaeda operated from its headquarters in the Afghanistan, bin Laden and al-Qaeda forged close relations with the ruling regime, known as the “Taliban,” and Taliban leader Muhammad Omar. Bin Laden openly informed other al-Qaeda members and associates outside Afghanistan of their support of, and alliance with, the Taliban and Omar.

335. One of the principal goals of al-Qaeda was to drive the United States armed forces out of Saudi Arabia (and elsewhere on the Arabian peninsula) and Somalia by violence. These goals eventually evolved into a declaration of jihad (holy war) against America and all Americans. Members of al-Qaeda issued fatwahs (rulings on Islamic law) indicating that such attacks on Americans were both proper and necessary.

336. Like Iran, al-Qaeda and bin Laden used terrorism as an instrument of policy, as a tool to be used to further political objectives. Al-Qaeda has, over the years, directly carried out murders, bombings and other terrorist acts against its enemies. It has also provided direct and indirect support to other international terrorist groups and received support in return, often in the form of money, training, sanctuary, documentation, intelligence, weapons and other types of assistance.

337. Al-Qaeda has often used operatives such as the hijackers to actively engage in terrorist activities against the United States and its citizens. In conducting those terrorist

activities, al-Qaeda received financial, logistical and other material support from Iran other foreign states.

Iran's Sponsorship of Terrorism and al-Qaeda

338. For many years, the Department of State has included Iran among the state sponsors of terrorism. Indeed, the Department of State has repeatedly described Iran as “the most active” state sponsor of terrorism.

339. At relevant times, Iran provided material support to bin Laden and al-Qaeda, often through Iran's state-sponsored terrorist organization, Hezbollah. That support included advice and assistance in planning attacks against American targets, as well as financial and logistical support for particular operations such as the 9/11 attacks.

340. Imad Fayez Mughniyah (a/k/a Hajj Radwan) was, for decades prior to his death in February 2008, the terrorist operations chief of Hizballah. Mughniyah was, since the early 1980s, affiliated with the Islamic regime in Iran, and he lived in Iran for many years. Imad Mughniyah was an agent of the Iranian regime. Imad Mughniyah had a direct reporting relationship to Iranian intelligence and a direct role in Iran's sponsorship of terrorist activities.

341. While Osama bin Laden and al-Qaeda were headquartered in Sudan in the early 1990s, Hassan al Turabi fostered the creation of a foundation and alliance for combined Sunni and Shi'a Muslim opposition to the United States and the West, an effort that was agreed to and joined by Osama bin Laden and Ayman al Zawahiri, leaders of al-Qaeda, and by the leadership of Iran.

342. The well-known historical religious division between Sunni and Shi'a Muslims did not pose an insurmountable barrier to cooperation in regard to terrorist operations by radical Islamic leaders and terrorists. Iran, which is largely Shiite, and its terrorist proxy organization, Hizballah, also Shiite, entered into an alliance with al-Qaeda, which is Sunni, to work together to

conduct terrorist operations against the United States during the 1990s and continuing through, and after, September 11, 2001.

343. In 1991 or 1992, discussions in Sudan between al-Qaeda and Iranian operatives led to an agreement to cooperate in providing support for actions carried out primarily against Israel and the United States. Thereafter, senior al Qaeda operatives and trainers traveled to Iran to receive training in explosives. Osama bin Laden also sent senior aides to Iran for training with the IRGC and to Lebanon for training with Hezbollah.

344. On October 31, 1991, Iran hosted the International Conference for the Support of the Muslim Palestinian People's Revolution, which was attended by radical Palestinian groups, both Islamic and secular. The conference established a permanent secretariat, funded by Iran, to coordinate pro-intifada activities. In doing so, Iran tightened its ties to the radical groups Palestinian HAMAS and Islamic Jihad.

345. At various times in or about 1992 and 1996, bin Laden and other ranking members of al-Qaeda made it known that they favored a policy under which al-Qaeda would put aside its differences with Shiite Muslim terrorist organizations, including the government of Iran and its affiliated terrorist group Hezbollah, in order to coordinate attacks against their perceived common enemy, the United States.

346. On or before 1994, al-Qaeda forged an alliance with the National Islamic Front of Sudan and with representatives of the government of Iran, and its associated terrorist group Hezbollah, for the purpose of working together against the United States and other perceived common targets.

347. Hezbollah is financed by the Iranian government. The amounts of Iranian government contributions to Hezbollah have varied over the years, ranging from an estimated 15-20 million dollars annually, to as much as 150-300 million dollars annually. Sheikh Subhi al-

Tufeili, Hezbollah's first leader, stated:

To deny the Iranian connection to Lebanon's Hezbollah would be like denying that the sun provides light to the earth. Who can deny such a thing?

348. Hezbollah's manifesto, as declared by Hezbollah's spokesman, Sheikh Ibrahim al-Amin states:

We, the sons of Hezbollah's Nation in Lebanon, whose vanguard God has given victory in Iran and which has established the nucleus of the world's central Islamic state, abide by the orders of a single wise and just command currently embodied in the supreme examples of Ayatollah Khomeini.

From this basis, we in Lebanon are not a closed organizational structural party, nor are we a narrow political framework, but we are a nation interconnecting with all Muslims of the World. We are linked by a strong ideological and political connection - Islam.

From here what befalls the Muslims in Afghanistan, Iraq, the Philippines or anywhere else verily afflicts the body of our own Islamic nation of which we are an inseparable part, and moved to confront it on the basis of our main legal obligation in light of the political view decided by our leader Wilayat al-Faqih [Ayatollah Khomeini].

349. In 1993, in a meeting in Khartoum, Sudan, arranged by Ali Mohamed, a confessed al Qaeda terrorist and trainer now in a U.S. prison, Osama bin Laden and Ayman al Zawahiri met directly with Iran's master terrorist Imad Mughniyah and Iranian officials, including IRGC Brigadier General Mohammad Baqr Zolqadr, a highly placed member of the Iranian terrorism apparatus. At the 1993 Khartoum conference, representatives of Iran, Hezbollah, and al Qaeda worked out an alliance of joint cooperation and support on terrorism. Ali Mohamed, who was charged with the 1998 bombing of the two United States Embassies in Africa, testified as follows during his guilty plea hearing on October 20, 2000:

I was aware of certain contacts between al-Qaeda and al Jihad organization, on one side, and Iran and Hezbollah on the other side. I arranged security for a meeting in the Sudan between Mughaniyah, Hezbollah's chief, and bin Laden. Hezbollah provided explosives training

for al-Qaeda and al Jihad. Iran supplied Egyptian Jihad with weapons. Iran also used Hezbollah to supply explosives that were disguised to look like rocks.

350. The 1993 meeting in Khartoum led to an ongoing series of communications, training arrangements, and operations among Iran and Hezbollah and al-Qaeda. Osama bin Laden sent more terrorist operatives to Hezbollah training camps operated by Imad Mughniyah and the IRGC in Lebanon and Iran. Among other tactics, Hezbollah taught bin Laden's al-Qaeda operatives how to bomb large buildings, and Hezbollah also gave the al-Qaeda operatives training in intelligence and security.

351. Throughout the 1990s, the al-Qaeda/Iran/Hezbollah terrorist training arrangement continued. Imad Mughniyah himself coordinated these training activities, including training of al-Qaeda personnel, with Iranian government officials in Iran and with IRGC officers working undercover at the Iranian embassy in Beirut, Lebanon.

352. As a result of the creation of this terrorist alliance, al-Qaeda's Ayman al Zawahiri repeatedly visited Tehran during the 1990s and met with officers of MOIS, including chief Ali Fallahian, and Qods Force chief Ahmad Vahidi.

353. At all times, Iran's Supreme Leader, Defendant Ayatollah Khamenei, was fully aware that Iran and Hezbollah was training foreign terrorists.

354. On June 7, 1996, Iran's spiritual leader, Ayatollah Ali Khamenei, declared that Hezbollah must reach "all continents and all countries."

355. In early June of 1996, Iran organized a pan-Islamist summit which had a primary objective of establishing an international coordination committee to oversee anticipated escalation in hostilities. Ayatollah Ahmad Jannati, a close associate of Ayatollah Khomeini, emerged as the spokesperson for the working group. The meeting was organized jointly by the Supreme Council for Intelligence Affairs and IRGC (Iranian Revolutionary Guard Corps) high

command. Attending the working group were the following: Ramadan Shallah (head of the Palestine Islamic Jihad); Ahmad Salah, a.k.a. Mamdouh Mahmoud Salim (Egyptian Islamic Jihad); Imad Mughniyah (Hezbollah); Muhammad Ali Ahmad (a representative of al-Qaeda and Osama Bin Laden); Ahmad Jibril (head of the Popular Front for the Liberation of Palestine-General Command); Imad al-Alami and Mustafa al-Liddawi (HAMAS); and Abdullah Ocalan (Kurdish People Party). The summit participants agreed on the unification of their financial system and training.

356. In or about July 1996, Osama bin Laden met with an Iranian intelligence official in Afghanistan.

357. In early October 1996, bin Laden visited Tehran for consultations. One of the issues addressed was the unification of various Egyptian terrorist organizations. Iranian intelligence Minister Ali Fallahian chaired the meeting with representatives from the Iranian Interior Ministry, Islamic Guidance Ministry, and Foreign Ministry. Among the Egyptians attending were the Tehran-based aide of defendant Ayman al Zawahiri, Kamal Ujayzah, and Mustafa Hamzah. The Iranians discussed specific long-term operational plans and explained to the Egyptian attendees that the degree of Iran's support depended on the extent of their unity. The Egyptian attendees agreed to form a unified command with Osama bin Laden for operational purposes.

358. In or about mid-September 1997, the Iranian leadership met to discuss the new course of the anti-American struggle. The participants included Iran's supreme and spiritual leader Ayatollah Ali Khamenei. Also present were newly-elected president Mohammad Khatami, former president Ali Akbar Hashemi-Rafsanjani, and the minister of intelligence, Qurban Ali Dari Najafabadi. Other participants in this conference were: General Rahim Safavi (the Commander-in-Chief of the IRGC); General Mohsen Rezai (former Commander-in-Chief of

IRGC, later responsible for reorganizing the Iranian security services and their networks); Ali Fallahian (former intelligence minister); Mohammed Mohammadi Rayshahri (former intelligence minister, present as Khamenei's special adviser on intelligence affairs); Hossein Sheikh-ol-Islam (Iran's former deputy foreign minister and once again director on the Office of Liberation Movements); Ali Akbar Mohtashemi; General Diya Sayfi (the commander of the IRGC forces in Lebanon); members of the Supreme National Security Council; and senior IRGC and intelligence officials.

359. In or about September 20-23, 1997, Iranian intelligence organized a major summit of terrorist leaders from all over the world. Among the participants were: Imad Mughniyah and Abdul-Hadi Hammadi (Hezbollah); Ayman al-Zawahiri (Egyptian Islamic Jihad); Ahmad Jibril (chief of the Popular Front for the Liberation of Palestine-General Command PFLP-GC); Osama Abu-Hamden and Imad al-Alami (HAMAS); Ramadan al-Shallah (chief of Palestinian Islamic Jihad); and three commanders representing branches of Hezbollah in the Persian Gulf States.

360. Participants at the summit examined the Islamists' ability to escalate terrorism against the United States and the West. Several senior Iranian officials addressed the summit and ordered the terrorist leaders to be ready to launch an unprecedented international terrorist campaign.

361. In or about late September 1997, the Iranian leadership met again to discuss the course of the forthcoming terrorism offensive in light of the resolutions and findings of the recent international terrorist summit.

362. In the second half of November 1997, Ayatollah Ali Khamenei convened a meeting with General Rahim Safavi and Ahmad Vahidi, the former commander of al-Quds Forces, to discuss the establishment of a new elite terrorist force to carry out spectacular, but deniable, terrorist strikes against the United States and the West.

363. Al-Qaeda telephone bills of international calls between 1996 and 1998 were analyzed by United States investigators, showing that nearly 10% of the outgoing calls from Afghanistan went to Iran.

364. The creation of the Iran/Hezbollah/al-Qaeda terrorist alliance, which began in the early 1990s, and during which Hezbollah terror chief Imad Mughniyah oversaw the training activities of members of various terrorist groups until his death in 2008, resulted in a string of deadly terrorist strikes aimed directly at the U.S. and its allies. Among these terrorist attacks were the following: in March 1992, a Hezbollah terrorist team operating under Mughniyah's command truck-bombed the Israeli embassy in Buenos Aires, Argentina; on February 26, 1993, the first World Trade Center bombing by al-Qaeda operatives occurred; a few months later, an al-Qaeda conspiracy to bomb several New York City landmarks, including the Lincoln Tunnel and the Holland Tunnel, was disrupted; in July 1994, Imad Mughniyah and a Hezbollah team, under the direction of Iran, MOIS, and the IRGC, truck bombed the *Asociación Mutual Israelita Argentina* ("AMIA"), the Jewish cultural center in Buenos Aires; in December 1994, Algerian terrorists associated with al Qaeda hijacked a French airliner, intending to crash it into the Eiffel Tower in Paris, a precursor to 9/11; on July 7, 1995, Ayman al Zawahiri's Egyptian gunmen, supported, trained, and funded by Iran, attempted to assassinate Egyptian President Hosni Mubarak near Addis Ababa, Ethiopia; on June 25, 1996, Saudi Hezbollah terrorists, acting on directions from Iran and under planning by the IRGC Qods Force commander, and with assistance from al-Qaeda, truck bombed the Khobar Towers housing complex in Dhahran, Saudi Arabia, where U.S. military servicemen were quartered; on August 7, 1998, two nearly simultaneous truck bombings, carried out by al-Qaeda under the direction Iran, MOIS, and the IRGC, and with training by Hezbollah, destroyed the U.S. embassies in Nairobi, Kenya, and Dar-es-Salaam, Tanzania; on October 12, 2000, al-Qaeda suicide bombers attacked the U.S.S. Cole

in the harbor of Aden, Yemen.

365. According to the State Department's *Patterns of Global Terrorism 2000*, Iran remained the most active state sponsor of terrorism in 2000. It provided increasing support to numerous terrorist groups, including the Lebanese Hezbollah, HAMAS, and the Palestine Islamic Jihad (PIJ), which seek to undermine the Middle East peace negotiations through the use of terrorism.

366. The State Department's *Patterns of Global Terrorism 2000* also stated that Iran's "Revolutionary Guard Corps (IRGC) and Ministry of Intelligence and Security (MOIS) continued to be involved in the planning and execution of terrorist acts and continued to support a variety of groups that use terrorism to pursue their goals."

367. In January 2001, Dr. Ayman al-Zawahri and other al-Qaeda leaders met with Iranian intelligence officials near the town of Varamin, just south of Tehran.

368. The Iranian delegation was headed by Hojjat-ol islam Ali Akbar Nateq-Nouri and included Imad Fayeze Mugniyeh, the Lebanese operative and leader of Hezbollah who is credited with numerous terrorist attacks on Americans. The purpose of the meeting was to plan and coordinate Iranian support for an upcoming al-Qaeda operation against the United States.

369. On May 4, 2001, a second planning meeting between al-Qaeda and Iranian intelligence officials was held in Iran. Attendees at this planning meeting included Khamenei, Rafsanjani, and bin Laden's son, Sa'ad bin Laden. Iranian intelligence memos written in the weeks following the meeting advise Iranian operatives to be prepared for U.S. retaliation for an attack planned for September 2001.

The September 11 Terrorist Attacks

370. During the mid-to-late 1980s, Iran began formulating contingency plans for asymmetrical or unconventional warfare against the United States, including terrorist operations.

These contingency plans were code-named "*Shaitan dar Atash*."

371. One of the "*Shaitan dar Atash*" contingency plans was for the hijacking of U.S. commercial airliners and crashing them into buildings, particularly in New York City and Washington, D.C. This contingency plan became the blueprint for the 9/11 attacks.

372. Defendants Iran and Hezbollah had actual foreknowledge of, and were complicit in the planning and coordination of the 9/11 attacks upon the United States which were carried out by members of defendant al-Qaeda under the direction of defendant Osama bin Laden.

373. In the mid-1990s, when the Iran/Hezbollah/al-Qaeda terror alliance was forming, al Qaeda operative Mustafa Hamid had "negotiated a secret relationship with Iran that allowed safe transit via Iran to Afghanistan." This safe Iran-Afghanistan passageway was managed by defendant MOIS.

374. In 2000, Iran facilitated the international travel of al-Qaeda's operatives' between October 2000 and February 2001, including travel of at least eight (8) of the 9/11 hijackers from Iran into Afghanistan, where bin Laden's training camps were located, and where the 9/11 hijackers trained for the 9/11 operation. Iran thus provided essential material and direct support for the 9/11 attacks.

375. The Iranian government materially and directly supported the 9/11 terrorist travel operation was by ordering its border inspectors not to place telltale Iranian stamps in the passports of these future hijackers traveling to and from Afghanistan via Iran. Eight to fourteen of the 9/11 hijackers transited Iran on their way to or from Afghanistan, and Iranian border inspectors did not stamp their Saudi passports. The Iranians were aware they were helping operatives who were part of an organization preparing attacks against the United States. The actions of Iranian border authorities in refraining from stamping the passports of the Saudi hijackers, vastly increased the likelihood of the operational success of the 9/11 plot.

376. A terrorist agent of Iran and Hezbollah also helped to coordinate other international travel by the 9/11 hijackers. In October 2000, Imad Mughniyah, the Hezbollah terrorist commander, visited Saudi Arabia to coordinate future 9/11 hijacker activities there and assisted them in traveling on to Iran during November 2000. During this time period, on their travels into and out of Iran, and through Beirut, Lebanon, some of the 9/11 hijackers were accompanied by Mughniyah or his Hezbollah associate.

377. The actions of Imad Mughniyah, and his Hezbollah associate(s), in escorting 9/11 hijackers on flights to and from Iran, and coordinating passport and visa acquisition activities in Saudi Arabia constituted direct and material support for the 9/11 conspiracy.

378. Prior to September 11, 2001, al-Qaeda, with the aid, assistance and support of Defendants, planned, funded and coordinated an attack upon American citizens. On September 11, 2001, nineteen al-Qaeda operatives carried-out that heinous attack by hijacking four airliners laden with jet fuel and causing them to crash into the World Trade Center Towers, the Pentagon Building and a field in Shanksville, Pennsylvania. The al-Qaeda operatives who executed that murderous attack were the following:

(a) Marwan Al-Shehhi, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked United Airlines Flight 175 and flew it into the South Tower of the World Trade Center on September 11, 2001. Al-Shehhi went through flight training in Florida with hijacker Muhammad Atta and may have been flying the second plane to hit the Trade Center. Prior to arriving in the United States, Marwan Al-Shehhi was a student at Technical University in Hamburg, Germany with Atta and hijacker Ziad Jarrah. Al-Shehhi is known to have been an operative in the al-Qaeda terrorist network.

(b) Ahmed Hassan Al Qadi Banihammad (“Banihammad”), a citizen of Saudi

Arabia, has been identified by the FBI as one of the persons who hijacked United Airlines Flight 175 and flew it into the South Tower of the World Trade Center on September 11, 2001. Banihammad listed the Spartan School of Aeronautics in Tulsa, Oklahoma as his home address although school officials have no record of his attendance. Banihammad is known to have been an operative in the al-Qaeda terrorist network.

(c) Ahmed Alghamdi, also known as Ahmed Salah Alghamdi, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked United Airlines Flight 175 and flew it into the South Tower of the World Trade Center on September 11, 2001. Ahmed Alghamdi has been identified as one of five hijackers who fraudulently obtained state identity cards in Virginia. *Al Watan*, an Arabic newspaper, reported that Alghamdi was a Saudi from Baha province who left the country in early 2000 for Chechnya. Immigration records in the Philippines showed he made several visits in the past two years. Alghamdi has direct links to Osama Bin Laden and the al-Qaeda terrorist network.

(d) Hamza Alghamdi, also known as Hamza Al-Ghamdi, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked United Airlines Flight 175 and flew it into the South Tower of the World Trade Center on September 11, 2001. U.S. officials have identified Alghamdi as having known links to the al-Qaeda network.

(e) Mohand Alshehri, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked United Airlines Flight 175 and flew it into the South Tower of the World Trade Center on September 11, 2001. Alshehri is known to have been an operative in the al-Qaeda terrorist network.

(f) Satam M. A. Al Suqami, a citizen of the United Arab Emirates, has been

identified by the FBI as one of the persons who hijacked American Airlines Flight 11 and flew it into the North Tower of the World Trade Center on September 11, 2001. Satam Al Suqami has used a birth date of June 28, 1976. Investigators have linked Suqami to Raed Hijazi who has been implicated in a plot to kill Americans and other tourists in Jordan on January 1, 2000. Suqami is known to have been an operative in the al-Qaeda terrorist network.

(g) Abdulaziz Alomari, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked American Airlines Flight 11 and flew it into the North Tower of the World Trade Center on September 11, 2001. Abdulaziz Alomari has used birth dates of December 24, 1972 and May 28, 1979. Alomari is believed to be a pilot. Alomari is known to have used false identification documents, including a Virginia driver's license that he fraudulently obtained a month before the attack on the World Trade Center. Alomari is known to have been an operative in the al-Qaeda terrorist network.

(h) Waleed M. Alshehri, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked American Airlines Flight 11 and flew it into the North Tower of the World Trade Center on September 11, 2001. Alshehri held multiple false passports. Alshehri is known to have had direct contacts with the al-Qaeda terrorist network.

(i) Wail M. Alshehri, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked American Airlines Flight 11 and flew it into the North Tower of the World Trade Center on September 11, 2001. Alshehri is believed to be a pilot. Alshehri used a birth date of September 1, 1968 and had a rental address in Hollywood, Florida. Alshehri is known to have been an operative in the al-Qaeda terrorist

network.

(j) Mohamed Atta, a citizen of Egypt, has been identified by the FBI as one of the terrorists who hijacked American Airlines Flight 11 and flew it into the North Tower of the World Trade Center on September 11, 2001. Atta is believed to have piloted the first plane into the World Trade Center. Investigation reveals that he studied at the Technical University in Hamburg, Germany and received flight training in Florida. Investigators believe that Atta met with Iraqi intelligence officials in Prague and also met with Islamic extremists in Spain. Atta also inquired about crop dusters in Florida. In Atta's luggage, which did not make American Airlines Flight 11, investigators found a four-page handwritten document in Arabic that included a checklist for the day of the attack. Atta is known to have been an operative in the al-Qaeda terrorist network.

(k) Khalid Almihdhar, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked American Airlines Flight 77 and flew it into the Pentagon Building on September 11, 2001. Khalid Almihdhar is believed to have met with Bin Laden operatives in Malaysia in early 2000 and is known to have been an operative in the al-Qaeda terrorist network.

(l) Nawaf Alhazmi, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked American Airlines Flight 77 and flew it into the Pentagon Building on September 11, 2001. A car registered to Nawaf Alhazmi was found at Dulles International Airport the day after the attacks. It contained a cashier's check made out to a flight school in Phoenix. Also found were four drawings of the cockpit of a 757 jet and a box-cutter type knife. Nawaf Alhazmi also had maps of Washington and New York, as well as a four-page handwritten document in Arabic which included a checklist for the day of the attack identical to the one found in the

luggage of fellow terrorist Mohamed Atta and also identical to a third such document recovered from the crash site in Pennsylvania. Nawaf Almihdhar is known to have been an operative in the al-Qaeda terrorist network.

(m) Hani Hanjour, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked American Airlines Flight 77 and flew it into the Pentagon Building on September 11, 2001. Investigators advised that Hanjour is believed to have been at the controls of the Boeing 757 that crashed into the Pentagon. Hanjour had flight training in San Diego, Phoenix and Scottsdale, Arizona. Hanjour is one of five hijackers identified as obtaining a false Virginia identity card at the Arlington, Virginia Department of Motor Vehicles on August 2, 2001. Hanjour lived in the United States intermittently for more than a decade before the attacks. Hanjour is known to have been an operative in the al-Qaeda terrorist network.

(n) Salem Alhazmi, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked American Airlines Flight 77 and flew it into the Pentagon Building on September 11, 2001. Alhazmi is believed to have had addresses in Fort Lee and Wayne, New Jersey. Alhazmi was among five terrorists who acquired false identification cards on August 2, 2001, from the Virginia Department of Motor Vehicles. Alhazmi is known to have been an operative in the al-Qaeda terrorist network.

(o) Majed Moqed, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked American Airlines Flight 77 and flew it into the Pentagon Building on September 11, 2001. Moqed acquired false identification cards in Virginia on August 2, 2001, and is known to have been an operative in the al-Qaeda terrorist network.

(p) Ziad Samir Jarrah, a citizen of Lebanon, has been identified by the FBI as

one of the persons who hijacked United Airlines Flight 93 on September 11, 2001. Jarrah is listed as a pilot in Hamburg, Germany aviation records and is believed to have been piloting Flight 93 when it crashed in Pennsylvania. Jarrah is believed to be part of the al-Qaeda cell in Hamburg, Germany that included terrorists Mohamed Atta and Marwan Al-Shehhi.

(q) Ahmed Ibrahim A. Al Haznawi, also known as Ahmed Alhaznawi (“Alhaznawi”), a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked United Airlines Flight 93 and flew it into a field in Shanksville, Pennsylvania on September 11, 2001. Alhaznawi has used a birth date of October 11, 1980 and is believed to be from the Saudi town of Baljurshi. News accounts have identified Alhaznawi as the son of a Saudi religious cleric, Sheik Ibrahim Alhaznawi, the leader of a mosque in the Saudi town of Hezna. On April 15, 2002, the Arab satellite television network Al Jazeera broadcast a videotape which shows Alhaznawi reading from a document dated March 6, 2001, titled “*the last Will of the New York and Washington battle martyrs.*” In discussing his role in the September 11 terrorist attacks, Alhaznawi states that “*it is time to kill Americans in their homeland, among their sons, and near their forces and intelligence.*” Alhaznawi is known to have been an operative in the al-Qaeda terrorist network.

(r) Saeed Alghamdi, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked United Airlines Flight 93 and flew it into a field in Shanksville, Pennsylvania on September 11, 2001. Alghamdi had previously been linked to Bin Laden and is known to have been an operative in the al-Qaeda terrorist network.

(s) Ahmed Alnami, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked United Airlines Flight 93 and flew it into a field in

Shanksville, Pennsylvania on September 11, 2001. Alnami is known to have been an operative in the al-Qaeda terrorist network.

379. On September 11, 2001, five of the al-Qaeda hijackers - Mohammed Atta, Abdul Alomari, Wail al-Shehri, Waleed al-Shehri, and Satam al-Suqami, hijacked American Airlines Flight 11 carrying 92 persons, bound from Boston to Los Angeles, and crashed it into the North Tower of the World Trade Center in New York at approximately 8:46 a.m., causing the collapse of the tower and the deaths of the 9/11 Decedents.

380. On September 11, 2001, five al-Qaeda hijackers - Marwan al-Shehhi, Fayez Ahmed, a.k.a. "Banihammad Fayez," Ahmed al-Ghamdi, Hamza al-Ghamdi, and Mohand al-Shehri - hijacked United Airlines Flight 175 carrying 65 persons, bound from Boston to Los Angeles, and crashed it into the South Tower of the World Trade Center in New York at approximately 9:02 a.m., causing the collapse of the tower and the deaths of the 9/11 Decedents.

381. On September 11, 2001, five al-Qaeda hijackers - Khalid al-Midhar, Nawaf al-Hazmi, Hani Hanjour, Salem al-Hamzi, and Majed Moqed - hijacked American Airlines Flight 77 carrying 64 persons, bound from Virginia to Los Angeles, and crashed it into the Pentagon Building in Arlington County, Virginia at approximately 9:37 a.m., causing the deaths of the 9/11 Decedents.

382. On September 11, 2001, four of the al-Qaeda hijackers - Ziad Jarrah, Ahmed al-Haznawi, Saaed al-Ghamdi, and Ahmed al-Nami - hijacked United Airlines Flight 93 carrying 45 persons, bound from Newark to San Francisco, and caused it to crash in a field near the town of Shanksville, Pennsylvania at approximately 10:10 a.m., causing the deaths of the 9/11 Decedents.

383. The September 11 terrorist hijackings and attacks referenced above resulted in the murder of the 2,976 Decedents. The hijackers used box cutters and knives to commit air

piracy and murder on behalf of al-Qaeda. They were assisted in their terrorist campaign by the Iran and the Instrumentality Defendants.

Iran's Support of al-Qaeda After the 9/11 Attacks

384. Iran and its instrumentalities continued to support al-Qaeda after the September 11 attacks. Iran provided material support to al-Qaeda after the 9/11 attacks by providing safe haven to al-Qaeda leaders and operatives, keeping them safe from retaliation by U.S. forces, which invaded Afghanistan.

385. Former Secretary of Defense Donald Rumsfeld stated on February 3, 2002, “We have any number of reports that Iran has been permissive and allowed transit through their country of al-Qaeda.” On February 4, 2002, Rumsfeld elaborated: “We do have a good deal of information to the effect that al-Qaeda and the Taliban have taken refuge there and others have used it as a transit point. We have no evidence at all that Iran has tried to stop them, that Iran has tried to turn them over to us or some other country or to incarcerate these people, the al-Qaeda, a terrorist network.”

386. In the late 1990s, al-Qaeda operative Mustafa Hamid had passed communications between Osama bin Laden and the Government of Iran. In late 2001, while in Tehran, Hamid negotiated with the Iranians to relocate al-Qaeda operatives and their families to Iran after the 9/11 attacks.

387. Pursuant to these negotiations, Iran facilitated the exit from Afghanistan, and into Iran, of numerous al Qaeda leaders, operatives, and their families when the United States-led multi-national coalition attacked the Taliban regime in Afghanistan in the fall of 2001. The Iran-Afghanistan safe passageway, established earlier to get al-Qaeda recruits into and out of the training camps in Afghanistan, was utilized to evacuate hundreds of al-Qaeda fighters and their families from Afghanistan into Iran for safe haven there. The IRGC knew of, and facilitated, the

border crossings of these al-Qaeda fighters and their families entering Iran.

388. Among the high-level al-Qaeda officials who arrived in Iran from Afghanistan at this time were Sa'ad bin Laden, a son of Osama bin Laden, and the man who would soon lead "al-Qaeda in Iraq," Abu Mussab Zarqawi. As the leader of al-Qaeda in Iraq, Zarqawi was responsible for a series of bombings, beheadings, and other attacks before being killed by U.S. forces in June 2006.

389. The No. 2 official of al-Qaeda, Ayman al Zawahiri, made particular arrangements for his own family's safe haven in Iran after 9/11, with the aid of his son-in-law Muhammad Rab'a al Sayid al Bahtiyti, an Egyptian-born al-Qaeda operative.

390. In late 2001, Sa'ad bin Laden facilitated the travel of bin Laden family members from Afghanistan to Iran. Thereafter, Sa'ad bin Laden made key decisions for al-Qaeda and was part of a small group of al Qaeda members involved in managing al-Qaeda from Iran.

391. During the months and years after September 11, 2001, Defendants Iran, the IRGC, and MOIS continued to provide substantial direct and material support to the al-Qaeda leaders, operatives, and their families inside Iran, that provided for their needs and shelter and maintaining their safety from American and U.S.-led coalition military forces in Afghanistan.

392. Since 2001, there have been numerous instances of al-Qaeda operatives and leaders meeting, planning, and directing international terrorist operations from the safety of Iranian territory. Senior al-Qaeda members continued to conduct terrorist operations from inside Iran. The U.S. intercepted communications from Saef al Adel, then in Mashad, Iran, to al-Qaeda assassination teams in Saudi Arabia just before their May 12, 2003 assault on three housing compounds in Riyadh. Al-Qaeda leaders in Iran planned and ordered the Riyadh attack.

393. On July, 28, 2011, the U.S. Treasury Department designated a node of the al-Qaeda terror network based inside Iran, freezing all of its financial assets under U.S. jurisdiction

and prohibiting any transactions with its identified operatives. The Treasury Department stated that some members of the network are based outside of Iran, but funnel recruits and cash through Iran “under an agreement between al-Qaeda and the Iranian government.”

394. One member of this network is Atiyah Abd al-Rahman (“Rahman”). The documents captured in the safe house occupied by Osama bin Laden at the time of his capture identify Rahman as bin Laden’s top deputy. According to the Treasury Department, Rahman is al-Qaeda’s “overall commander in Pakistan’s tribal areas and as of late 2010, the leader of al-Qaeda in North and South Waziristan, Pakistan.” The Treasury Department adds: “Rahman was previously appointed by Osama bin Laden to serve as al-Qaeda’s emissary in Iran, a position which allowed him to travel in and out of Iran with the permission of Iranian officials.” For several years after 9/11, Rahman was protected by the Iranian regime. He is one of the senior al-Qaeda leaders supposedly held under a loose form of “house arrest” in Iran.

395. The Iran-based Al Qaeda network is headed by another terrorist, Ezedin Abdel Aziz Khalil (aka Yasin al Suri). The Treasury Department’s designation notes that “Iranian authorities maintain a relationship with Khalil and have permitted him to operate within Iran’s borders.” Khalil’s activities include moving “money and recruits from across the Middle East into Iran, then on to Pakistan,” where they serve senior al-Qaeda leaders.

396. According to David S. Cohen, Under Secretary of Treasury for Terrorism and Financial Intelligence, “There is an agreement between the Iranian government and al-Qaeda to allow this network to operate. There’s no dispute in the intelligence community on this.”

Defendants Are Liable to Plaintiffs for Their Material Support of al-Qaeda

397. Defendants instructed, trained, directed, financed and otherwise supported and assisted al-Qaeda, or conspired in the instruction, training, direction, financing, and support of al-Qaeda, in connection with al-Qaeda’s terrorist plans. In furtherance of those plans, the al-Qaeda

hijackers deliberately caused planes to crash into the World Trade Center Towers, the Pentagon and a field in Shanksville, Pennsylvania on September 11, 2001.

398. As a direct and proximate result of the intentional, willful, reckless, and careless actions of Defendants, all Plaintiffs have suffered severe and permanent personal injuries, damages, and losses, including the following:

- (a) Decedents' fear of death prior to the crash into and collapse of the World Trade Center Towers, the crash into the Pentagon and the crash of United Airlines flight 93;
- (b) the severe mental anguish suffered by the Decedents and all Plaintiffs;
- (c) the severe pain and suffering suffered by the Decedents and all Plaintiffs;
- (d) the inability of all Decedents to perform the usual household and personal activities that they normally would have performed through the remainder of their natural life expectancies;
- (e) loss of Decedents' earnings and future earning potential;
- (f) loss of Decedents' life and life's pleasures;
- (g) loss of consortium, solatium and/or companionship;
- (h) costs relating to managing the estates of all Decedents; and
- (i) death of the Decedents by way of murder as a result of the Defendants' conduct and that of their co-conspirators.

399. The aforementioned deaths, personal injuries and losses experienced by the Plaintiffs were caused by the intentional, outrageous, reckless, and careless acts of all Defendants, acting individually and in concert, and of their agents, servants, employees, agencies and instrumentalities, acting within and during the course and scope of their employment, authority, or apparent authority.

CLAIMS

COUNT ONE

***CLAIMS BY U.S. NATIONAL PLAINTIFFS AGAINST
ALL DEFENDANTS UNDER SECTION 1605A
FOREIGN SOVEREIGN IMMUNITIES ACT
28 U.S.C. §1605A***

400. Plaintiffs incorporate herein by reference the averments contained in the preceding paragraphs as though fully set forth at length.

401. At all relevant times, Defendant Iran was designated as a state sponsor of terrorism as required by § 1605A(a)(2)(A)(i)(I) in order to maintain an action under § 1605A of the Federal Sovereign Immunities Act (“FSIA”), 28 U.S.C. §1605A(a)(2)(A)(i)(I).

402. The conduct of the Al Qaeda hijackers constituted acts of extrajudicial killing and torture within the meaning of FSIA §1605A(a)(1).

403. Iran and the Instrumentality Defendants provided material support and resources to al-Qaeda in furtherance of the murderous acts of the al-Qaeda hijackers.

404. At all relevant times, al-Qaeda and the hijackers were agents of Iran acting within the scope of their agency.

405. The conduct of all Defendants violated the provisions of the FSIA, in particular 28 U.S.C. §1605A, and all Plaintiffs suffered damages as a result of that violation.

406. Plaintiffs, as estate representatives and family members of certain 9/11 Decedents, are entitled to recover damages from all Defendants under the provisions of the FSIA.

407. The injuries and damages suffered by the Plaintiffs by virtue of the death the 9/11 Decedents, and the consequences resulting there from, were proximately caused by the intentional and reckless acts of all Defendants as described herein.

408. As a direct and proximate result of the deaths of the 9/11 Decedents, Plaintiffs have been deprived of future aid, assistance, services, comfort, and financial support.

409. As a direct and proximate result of Defendants' cowardly, barbaric and outrageous acts of murder, Plaintiffs will forever grieve the deaths of the 9/11 Decedents.

410. As a further result of intentional and reckless acts of Defendants, Plaintiffs have been caused to expend various sums to administer the Estates of the 9/11 Decedents and have incurred other expenses for which they are entitled to recover.

411. As a result of the Defendants' murderous conduct, the 9/11 Decedents suffered damages including pain and suffering, trauma, emotional distress, loss of life and life's pleasures, loss of earnings and earning capacity, loss of accretion to their estates and other items of damages as fully set forth in the paragraphs above which are incorporated herein by reference.

412. As a result of the intentional, reckless and negligent acts of Defendants as described above, the 9/11 Decedents were placed in apprehension of harmful and offensive bodily contact (assault), suffered offensive and harmful bodily contact (battery), suffered extreme fear, anxiety, emotional and psychological distress (intentional/negligent infliction of emotional distress), and were mentally and physically harmed, trapped, and falsely imprisoned (false imprisonment) prior to their deaths.

413. The actions of all Defendants, acting in concert to carry out their unlawful objectives, were malicious, outrageous and in willful, wanton, and reckless disregard of the rights of the 9/11 Decedents and all Plaintiffs. Defendants, acting individually and jointly, intended to carry out actions that would end the lives of the Decedents.

414. Plaintiffs are entitled to solatium and other damages, as stated in § 1605A(c)(4) of the FSIA, 28 U.S.C. § 1605A(c)(4).

415. As a result of their intentional, malicious, outrageous, willful and wanton conduct, all Defendants are jointly and severally liable to all Plaintiffs for punitive damages.

WHEREFORE, Plaintiffs demand judgment in their favor against the Defendants,

jointly, severally, and/or individually, in an amount in excess of One Billion Dollars (\$1,000,000,000) for compensatory, punitive damages and solatium, plus interest, costs, and such other monetary and equitable relief as this Honorable Court deems appropriate.

COUNT TWO

CLAIM BY NON-U.S. NATIONAL PLAINTIFFS AGAINST ALL DEFENDANTS PURSUANT TO THE ALIEN TORT CLAIMS ACT AND TORTURE VICTIM PROTECTION ACT OF 1991, 28 U.S.C. § 1350

416. Plaintiffs incorporate herein by reference the averments contained in the preceding paragraphs as though fully set forth at length.

417. As set forth above, Defendants, jointly and severally, caused the extrajudicial killings of each of the 9/11 Decedents through and by reason of acts of international terrorism. These terrorist activities constitute violations of the law of nations, including those international legal norms prohibiting torture, genocide, air piracy, terrorism and mass murder.

418. As a result of the Defendants' violation of the law of nations, all Plaintiffs suffered damages as fully set forth in the paragraphs above.

419. Pursuant to 28 U.S.C. §1350, the estates, survivors and family members of the 9/11 Decedents who are not United States citizens are entitled to recover damages against Defendants for wrongful death, survival, intentional infliction of emotional distress and solatium.

420. The injuries and damages suffered by Plaintiffs who are non-U.S. citizens by virtue of the death the Decedents, and the consequences resulting there from, were proximately caused by the intentional and reckless acts of all Defendants as described herein.

421. As a direct and proximate result of the Defendants' cowardly, barbaric and outrageous acts of murder, Plaintiffs who are non-U.S. citizens have suffered damages as described above.

422. The actions of all Defendants, acting in concert to carry out their unlawful

objectives, were malicious, outrageous and in willful, wanton, and reckless disregard of the rights of all the Plaintiffs. Defendants, acting individually and jointly, intended to carry out actions that would end the lives of the Decedents.

423. As a result of their intentional, malicious, outrageous, willful and wanton conduct, all Defendants are jointly and severally liable to all Plaintiffs for punitive damages.

WHEREFORE, Plaintiffs demand judgment in their favor against the Defendants, jointly, severally, and/or individually, in an amount in excess of One Billion Dollars (\$1,000,000,000) for compensatory, punitive damages and solatium, plus interest, costs, and such other monetary and equitable relief as this Honorable Court deems appropriate.

Respectfully submitted,

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